

City of Greenville, Mississippi



Errick D. Simmons
Mayor

Office of the Mayor

City Councilmembers

Al Brock, Ward 1
Lois Hawkins, Ward 2
Carolyn Weathers, Ward 3
Lurann Thomas, Ward 4
Tasha Bailey, Ward 5
James Wilson, Ward 6

340 Main Street • P. O. Box 897 • Greenville, MS 38701 • Telephone: 662-378-1501 • Facsimile: 662-378-0276 • Email: edsimmons@greenvillems.org

Narrative Information Sheet

R04-19-C-003

1. Applicant Identification

City of Greenville
340 Main Street
Greenville, MS 38701

2. Funding Requested

a. Cleanup Grant Type: Single Site

b. Federal Funds Requested

i. \$ 350,000

c. Contamination: Hazardous Substances

3. Location: Greenville, Washington County, Mississippi

4. Property Information: Former Elks Lodge, 504 Washington Avenue, Greenville 38701

5. Contacts

a. Project Director

Errick D. Simmons
Mayor
City of Greenville
340 Main Street
Greenville, MS 38701
662-378-1501
EDSimmons@greenvillems.org

b. Chief Executive/Highest Ranking Elected Official

Same as above

6. Population: 31,934

7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	2
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	

8. State Environmental Letter – See attached



STATE OF MISSISSIPPI

PHIL BRYANT

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

GARY C. RIKARD, EXECUTIVE DIRECTOR

December 14, 2018

Mr. Everett R. Chinn
Executive Assistant to the Mayor/Public Relation Officer
City of Greenville
340 Main Street
Greenville, MS 38701

RE: EPA Brownfield Grant Application Acknowledgement
Elks Fraternity Lodge Cleanup Grant Proposal

Dear Mr. Chinn:

The Mississippi Department of Environmental Quality (MDEQ) hereby acknowledges the City's plans to conduct brownfield cleanup and plans to apply for federal grant funds through the United States Environmental Protection Agency's (EPA) Brownfields initiative for the Former Elks Fraternity Lodge in Greenville, Mississippi. The collaboration between MDEQ and the City on a number of sites within the city limits over the years has given the city the necessary experience to turn future assessment and cleanup plans into a reality.

Since many brownfields are abandoned, underutilized, and contaminated, MDEQ is expressly interested in seeing entities like the City of Greenville taking the initiative to assess, remediate, and return these sites to productive use. These efforts are consistent with our mission to safeguard the health, safety, and welfare of present and future generations of Mississippians. We look forward to our continued role in the City's Brownfield Initiative and are available to assist you at any time. Should you have any questions or comments concerning this matter, please contact me at (601) 961-5240.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas L. Wallace".

Thomas L. Wallace, P.E.
Branch Chief – GARD I

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

1. **PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

a. **Target Area and Brownfields**

i. Background and Description of Target Area

The City of Greenville, Washington County, Mississippi, population 31,934, sits on the East bank of Lake Ferguson, a tributary of the Mississippi River in the heart of the Yazoo/Mississippi Delta. Prior to the Civil War, Greenville was a cultural and business center for the large cotton plantations that surrounded it. With the continued rise of cotton agriculture in the Delta in the 1800s and into the 1900s, the City emerged as a major port on the Mississippi River. Its status as a primary port city in the most fertile cotton-growing region in the country attracted a growing number of merchants. From the 1950s – 1970s the City was home to a ship building industry that employed thousands. Greenville is at a crossroads. Population and industry that defines it as a port city have been declining for 20 years (a 23% loss from 2000 to 2017).¹

In May of 2011 a record Mississippi River flood shut down the port and river casinos and put 800 people out of work. Dozens of residents between the levee and the river had to evacuate. The County was declared a federal disaster area. In the 5 years after the flood the City saw the closing or the downsizing of many area employers. Delta Community Mental Health Center (232 jobs), Brintons US Axminster (150 jobs), Leading Edge Aviation Services (100 jobs), K-Mart (89 jobs), Wexford Health Services (81 jobs), Kroger (80 jobs), Jubilee Casino (77 jobs), and Loveland Products (24 jobs) all closed or downsized and the jobs have not returned.² With loss of population and skilled workforce, the City has been hindered in attracting new business and expansion of existing ones. This negatively impacts support businesses such as health care, education, transportation, and housing creating a domino effect. Well-paying manufacturing jobs have been replaced by lower paying or part-time jobs. As of 2016, the top three categories for employment in the City were health and education, followed by hospitality and retail. In 2017, manufacturing accounted for only 7.5% of all jobs, down from 19.9% in 2000.³ To renew the City, current assets must be stabilized, further deterioration must be slowed then reversed, and revitalization on an ambitious scale must be attempted.

ii. Description of the Brownfield Site(s)

The property to be cleaned up is a 13,500 square-foot three story commercial building on 0.24 acres that formerly supported an Elks Lodge clubhouse. The property is on one of the main downtown streets of the City and presents both a safety hazard and an eyesore. The property was developed in its current condition around 1906 and was vacated in the early 2000s. Since then, the property has been vacant and has been dilapidated due to exposure to the elements and lack of maintenance. In July 2016, a structural evaluation was conducted on the building and determined the building is structural unsound and it could not be restored due to the level of deterioration. **Environmental surveys in 2018 revealed the building is contaminated by asbestos and lead-based paint.** Surrounding properties include those currently used as parking lots (previous structures have been demolished) and a vacant auto dealership. An adjacent bank building is the site of a former gas station. The up-gradient former gas station and auto dealership have a potential for a release of contaminants from USTs, dispensing of gasoline, and automobile maintenance. **A soil and groundwater investigation of the property identified the shallow soil surrounding the building**

¹ US Census, FactFinder.com

² MS Department of Employment Security, Worker Adjustment and Retraining Notifications (WARN)

³ American Community Survey (ACS) 2013-2017, US Census FactFinder.com

contaminated with lead, likely from the peeling of lead-based paint. The property is located less than one half block from residential areas northeast of the downtown. According to FEMA, the property is located in a zone of reduced flood risk (zone X) due to the presence of a levee; however, despite the levy, the City and the site was subject to the referenced historical flooding event in 2011 and subsequent flooding in 2016 (FEMA 4268 DR). Moreover, the property presents both a safety and health danger to trespassers, and if not properly dealt with can result in a release of both lead and asbestos to the commercial area and adjacent neighborhood. This abandoned building in conjunction with other nearby abandoned or vacant properties are an economic drain on the downtown commercial area.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans

In 2014, with funding from the South Delta Planning and Development District (SDPDD), the City developed its strategic plan.⁴ The Plan is being used to inform the ongoing Community-wide Assessment activities including site selection and prioritization. Demolition and reuse of the former Elks Lodge property has been identified as a priority. Strategic Directions (SD) and objectives that came out of community involvement for the Strategic Plan include:

SD 1: Stabilize our population and enhance our local and regional economy;

Objective 1.1: Eliminate dilapidated properties and aggressively rebuild core neighborhoods.

SD 3: Promote and facilitate excellent project and environmental design;

Objective 3.3: Create an environmentally friendly city with minimum soil erosion, local flooding, and pollution. Minimize flooding from runoff, reduce sedimentation of streams and other water bodies.

SD 5: Preserve Open space and promote recreational opportunities;

Objective 5.1 Support a visually attractive city with significant vistas and plenty of parks and open space for passive recreational activities.

SD 6: Support existing public and cultural facilities and create a sustainable plan for maintaining them;

Objective 6.1: Encourage redevelopment in existing neighborhoods to take advantage of existing infrastructure.

SD 8: Facilitate the creation of a beautiful and vibrant downtown and waterfront;

Objective 8.3: Ensure that the downtown and waterfront support both traditional downtown functions of commerce, government, tourism, entertainment and recreation.

Demolition of former Elks Lodge building and reuse of the property as a “pocket park” in on a major downtown commercial street aligns with the Strategic Plan objectives, as the site backs up to an adjacent neighborhood.

ii. Outcomes and Benefits of Redevelopment Strategy

The proposed cleanup and reuse strategy for the former Elks Lodge property will both result in the creation of a park/greenspace and stimulate economic activity in our downtown area by improving the streetscape creating a better environment for local businesses, eliminating a safety hazard and attractant for crime, and providing passive recreational opportunities attracting residents and tourists to the downtown area. Note, a casino currently operates adjacent to downtown on the river. Attracting casino visitors to the downtown shops is one of our planning objectives. The planned passive green space will also provide an attractive amenity for visitors and residents alike.

⁴ City of Greenville – Strategic Directions, April 2014.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

In 2012, the City received a \$108,000 grant from the Mississippi Department of Archives and History (MDAH) for the rehabilitation of the vacant Greenville Y&MV Railroad Depot located at 738 Washington Avenue, two blocks from the Elks Lodge. This work was completed in 2017 and included the historic rehabilitation of the property to mirror period development from the 1910s. In addition, the City received a 2012 Mississippi Department of Transportation (MDOT) transportation enhancement project grant for \$432,000 for road expansion and overall redevelopment of the structure. In 2017, MDOT awarded an additional \$32,000 to help restore the Depot roof. Overall, \$540,000 was awarded to the City to help improve a similarly vacant building along Washington Avenue to improve tourism, remove blight, and lower crime.

This City will use these cleanup funds to build on those previous effort and to move the site towards its next reuse as a recreational and open space area. *The City intends to use a multi-layered approach to funding including loans*, such as USDA Rural Development Loans; *grants*, including the Community Foundation of Washington County (local) and Mississippi State Wildlife, Fisheries and Parks Outdoor Recreational Grants, such as Land Water Conservation Fund or Recreational Trails Program.

ii. Use of Existing Infrastructure

The Elks Lodge property, proposed for reuse as a “pocket park” is on a primary downtown street in Greenville with roads, sidewalks, and any needed utilities in place. Park development may require additional lighting, public sanitary facilities, sidewalks, and stormwater upgrades, which will be addressed in loan and grant proposals as described in section 1.c.i. In addition, during the January 16, 2018 public meeting held to discuss this and other on-going and planned brownfield initiatives, attendees suggested that the building columns be preserved and utilized as monument or focal point of the park. This request will be addressed and accommodated as feasible during the design of the demolition and the park.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

The City is unable to fund this cleanup without EPA assistance. The City budget is already strained by a recent consent order issued by EPA in 2016 to update their sewer and waste water treatment systems in accordance with updates to the Clean Water Act, which estimates indicate will cost the City in excess of \$10 million.

The State does not have a funding source for brownfield cleanup. Greenville is a relatively small City with over 85% minority population, a poverty rate of 35.4% (more than twice that of the US), a median household income at \$28,204, less than half that of the US, and an unemployment rate approximately three times that of the US.⁵ As shown in Section 1.a.i. above, the City has shown significant loss of manufacturing and other employment, and commensurate loss of tax base since 2011. In addition, the flood of 2011 created significant economic impact on its own. From 2016 to 2017 property tax revenues have decreased by 1.55%; overall, City revenues have decreased by more than \$2.9 million in the last 2 fiscal years⁶

⁵ ACS 2013-2017

⁶ City of Greenville Comprehensive Annual Report, year ended September 30, 2017

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The majority of Greenville's residents classify as minority (81.8% minority, predominantly African-American). The Target Area which, includes the downtown and surrounding residences (Census Tract #6, Washington County), is almost exclusively minority (96.8%). Thirty-six percent (36%) of the City lives in poverty, while the Target Area exhibits a poverty rate of 66.4%! The City's median household income at \$28,204 is approximately half that of the US and the poverty rate is almost three times that of the US.⁷ Crime is a significant issue for the neighborhood, including and immediately adjacent to the former Elks Lodge. A November 2018 Neighborhood Scout report gives the neighborhood a crime index value of 3 where 100 is the safest. Crime per square mile is shown as 200 compared to a value of 75 for the city and 21 for the State.⁸ This vacant building is poorly secured and can be an attractant for crime. The existence of this large abandoned structure contributes to blight in the downtown and adjacent neighborhood. The lead contaminated soil, and the deteriorating condition of the asbestos and lead-paint, is a significant human health concern to the public, including from residents located half a block away.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The Delta Regional Medical Center Community Health Needs Assessment (2016), intended to guide its program for fiscal years 2017 – 2019, evaluated the conditions in Washington County. Washington County's average remains just slightly below the highest level at (4.9) for socioeconomic indicators/barriers to healthcare that are known to contribute to health disparities related to education, culture, language, income and housing. The Needs Assessment shows that despite the fact that US incidence and death rates for all cancers have been declining due to advances in research, detection and treatment, in Washington County the age-adjusted invasive cancer incident rate has increased. Per the Needs Assessment, in Washington County infant mortality now stands at 12.2 per 1000 live births. The State of Mississippi is currently at a rate of 8.2 per 1000 live births. Public Health District III, which covers the City, had the 3rd highest asthma prevalence (7.8%) of the 9 public health districts in MS.⁹ Access to recreation and fitness facilities encourages physical activity and other healthy behaviors. In Washington County, the recreation and fitness establishment rate per 100,000 residents is low - 5.87, compared with a rate of 9.7 nationally.¹⁰ The proposed reuse of the Elks Lodge property if for park space, combined with a more vibrant walkable downtown, should encourage more physical activity for local residents.

Lead has been identified in the shallow soil surrounding the building, and within painted surfaces throughout the building. Asbestos has also been identified in the abandoned structure. The lead impacted soil will be excavated, and the building will be demolished to allow for the future reuse. Potential impacts include:

- Lead: Low levels of lead in the blood of children can result in permanent damage to the brain and nervous system, leading to behavior and learning problems and anemia. Pregnant women are also highly vulnerable to lead exposure, which can result in serious effects on the developing fetus.¹¹
- Asbestos: Asbestos can cause asbestosis, a scarring in the lungs caused by breathing asbestos

⁷ ACS 2013-2017

⁸ Neighborhood Scout

⁹ Mississippi Department of Health, "The Burden of Asthma in Mississippi", 2014

¹⁰ Delta Regional Medical Center Community Health Needs Assessment (2016)

¹¹ toxtown.nlm.nih.gov

fibers; and mesothelioma, a rare cancer of the membrane that covers the lungs; and lung cancer.¹²

(3) Economically Impoverished/Disproportionately Impacted Populations

The demographic index (EPA EJ Screen, based on the average of two demographic indicators; Percent Low-Income and Percent Minority) shows the area immediately surrounding the cleanup property to fall in the 95-100 percentile compared to the US. Similarly, the index for “less than high school education” places the immediate area in the 95-100 percentile. The EJ Screen for a one-mile radius surrounding the subject site (population 6,483) shows the area in the 83rd percentile for Air Toxics cancer Risk, the 81st percentile for Respiratory Hazards, and the 88th percentile for Lead Paint indicator.¹³ Three manufacturers within approximately one mile of the target area neighborhoods showed releases for toxic chemicals in 2016: Platte Chemical company (pesticide and agricultural chemicals manufacturer), Scott Biodiesel, and USG Interiors (lead, mercury). In addition, one former Superfund Site, Walcott Chemical, was located immediately adjacent to downtown.¹⁴ Cleanup of this brownfield site, eliminating this small but significant pathway for asbestos and lead-based paint exposure, and the related safety hazard, will be one positive step in the right direction.

b. Community Engagement

i. Community Involvement

To ensure appropriate and sustainable reuse of brownfield properties, Greenville has identified and collaborated with individuals from the community, including local residents, bankers, realtors, chamber of commerce and other stakeholders to provide input to the City’s brownfields program. This group will continue to provide input to the cleanup plan and reuse planning for the Elks Lodge property. Community partners are listed in the table below:

Partner Name	Point of Contact	Specific Role in the Project
Main Street Greenville	Gretchen Giachelli, 662-378-3121	Input on reuse decisions; public advocate
Mississippi Action for Community Education	Mable Starks, President, mstarks@deltamace.org ; 662-335-3523	Input on cleanup, reuse and infrastructure improvement; public outreach
Washington County Economic Alliance	Cary Karlson, Executive Director, ckarlson@wceams.com ; 662-378-3141	Input on reuse decisions and infrastructure improvements; public outreach
Mr Drew Newsom, Greenville Historic Preservation Administration and Developer/adjacent land owner	Drew Newsom, 813-789-4219, newsom@blackacregrgroup.biz	Input on reuse decision, and support of building demolition
Greenville Public Schools	Kavarica McCurry, Parent and Family Engagement Specialist, 662-334-3842	Input on community engagement, advocate for school children and families

ii. Incorporating Community Input

The City currently has a Community Involvement Plan (CIP) in place for our existing Community-wide Assessment grant. The CIP will be modified to address the proposed cleanup activities. A public meeting was held on January 16, 2019 to inform the community of this proposed cleanup grant application and to solicit comments on the draft Analysis of Brownfields Cleanup Alternatives (ABCA) and reuse planning. Those present at the meeting were in support of the project, and

¹² atsdr.cdc.gov/asbestos

¹³ EPA EJ Screen

¹⁴ EPA ToxMap

suggested that the columns from the building be salvaged and be used as focal point for the park development.

An additional meeting will be held immediately prior to the cleanup/demolition activities to describe the planned actions and address any health/safety concerns. A third meeting will be held to allow community input into the park redevelopment. (The city is not planning on the need for interpreters since less than 1% of those living in the area are non-English speaking.) CIP elements for disseminating information and soliciting feedback will include: public service announcements (PSAs) placed in the Delta Democrat Times as well as aired on local radio stations WBAQ (97.9 FM) and WNIX (1330 AM); monthly progress updates placed on the City's website with responses to questions received at public meetings; and, copies of project quarterly reports, draft and final ABCAs, reuse plans, and the final cleanup report placed in the William Percy Memorial Library.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The primary objective of the cleanup is to reduce or prevent potential risk to human health and/or the environment from site contaminants. **The selected cleanup alternative is the demolition of the Elks Lodge building as Asbestos-containing Material (ACM). In addition, the building debris would be characterized for lead contamination via TCLP analysis, and all building debris would be adequately disposed of as asbestos and/or lead containing materials at an appropriate landfill. After the demolition of the building, excavation of the contaminated soil, backfilling with clean soil, and the removal of the contaminated soil to a proper disposal facility. All soil removal activities will be conducted under the guidance of the Mississippi Department of Environmental Quality (MDEQ) Groundwater Assessment / Remediation Division (GARD).** Demolition activities would be conducted under EPA approved wet methods to prevent the release of asbestos fibers from impacting human health and/or the environment.

The selected alternative was evaluated against the no-action alternative, encapsulation and partial abatement, engineering controls, and full abatement. The no-action alternative was rejected as the soil contamination and potential release of hazardous materials (lead/ACM) would remain. The encapsulation alternative of the asbestos and LBP would entail the complete enclosure of hazardous materials with another material to prevent direct contact/disturbance or release to the environment. The partial abatement alternative would include the attempted removal of all the damaged or deteriorating ACM and LBP. However, this option would ultimately require that the building and some, if not all, hazardous materials remain on site, in a structure that is physically deteriorating and unstable. The full abatement alternative would be attempted for the removal of all LBP and ACMs in accordance with applicable regulations. However, given the deteriorating condition of the building, it is not possible to safely remove all hazardous materials and some would remain on site, posing an unacceptable threat of direct contact/disturbance or a release of LBP/ACM to the environment. The engineering controls for the contaminated soil was rejected because it would not align with the proposed reuse as a park.

The Elks Lodge is currently listed by the Mississippi Department of Archives and History (MDAH) as a historic building. As a cross-cutting measure, approval from MDAH and verification of National Historic Preservation Act (NHPA) compliance will be confirmed. It is anticipated that mitigation/photo-documentation of building features by an architectural historian will be performed to ensure compliance with the referenced act.

b. Description of Tasks and Activities

The Qualified Environmental Professional (QEP) will, after public input, finalize the Analysis of Brownfield Cleanup Alternatives (ABCA) and develop a site-specific Quality Assurance Project Plan (QAPP), including a Health and Safety, plan for cleanup of the site. (A generic QAPP has been developed as part of the Community-wide Assessment grant.) The QEP will conduct necessary activities and provide documentation to comply with the requirements of the State Historic Preservation Officer. *This will be completed within 0-4 months of grant award.*

The QEP, together with City staff, will finalize a Community Involvement Plan (CIP) amendment to address public involvement related to the cleanup. The City with QEP support will conduct a minimum of two public meetings, will update the City web site, will conduct outreach through PSAs, and will update the records repository at the library. The QEP with City staff will coordinate with Public Health District III as needed for any health concerns. The QEP with City staff will ensure neighboring businesses and residences are aware of cleanup/demolition scheduling and all efforts will be taken to eliminate disruption. Two City staff are scheduled to attend two national/regional conferences/training opportunities. *The CIP will be completed within 0-4 months of grant award. Community involvement activities will continue throughout the project period.*

The QEP will finalize cleanup plans, including specifying all regulatory requirements for cleanup and disposal, and will develop contracting documents. The QEP will solicit for and procure a qualified contractor for soil excavation and demolition of the building as Asbestos-containing Material (ACM), and, if sampling demonstrates, as LBP-containing material. Procurement will be compliant with federal contracting requirements at 40 CFR 200.317 through 200.326. The QEP will oversee soil excavation and demolition and disposal ensuring all OSHA permissible exposure limits for asbestos and lead are not exceeded for construction workers and EPA Asbestos Hazardous Emergency Response Act (AHERA) regulations are complied with. Toxicity Characteristic Leaching Procedure (TCLP) for lead will be conducted prior to final disposal decisions, and if required material will be disposed of as hazardous waste.

A final asbestos compliance report will also be prepared. Because of the lead contamination in soil, the site is eligible to be entered into the MDEQ Voluntary Cleanup Program (VCP) and the Mississippi Brownfields Program to obtain regulatory closure. However, based on the small amount of removal and fees associated with the VCP, the soil cleanup will be conducted under MDEQ GARD's Uncontrolled Sites Division (USD). A final Corrective Action Plan (CAP) report outlining the soil cleanup activities is required to be submitted to MDEQ GARD for their review and approval. *Cleanup/demolition activities will be completed within 10 months of grant award.*

The City, with assistance from the QEP, will conduct administrative and programmatic activities related to grant management including all reporting and entry of data into EPA's ACRES database. The City and the QEP will meet quarterly (more frequently during cleanup/demolition) to ensure the project remains on schedule. The City and QEP will prepare final reports for MDEQ and EPA. *This will occur throughout the project period (estimated 18 months).*

Discuss how the required 20% cost share will be met.

The City is requesting a cost share hardship waiver based on the criteria of: low per-capita income, substantial population loss, local natural disaster, closure of industrial firms, and an estimated \$10 million in wastewater/stormwater compliance costs that has limited our taxing and borrowing capacity. In the event the hardship waiver is not granted, the City will utilize a combination of: USDA Rural Development Loans; Community Foundation of Washington County local grants;

Mississippi State Wildlife, Fisheries and Parks Outdoor Recreational Grants; and local municipal revenue to meet the 20% cost share requirement. Should these resources be used for the cost share match they may not be fully available for leveraged funding. *The Hardship waiver request is included in the Threshold Criteria attachment.*

c. Cost Estimates and Outputs
Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		ABCA/Clean-up Planning	Community Involvement	Cleanup	Program Management	
Direct Costs	Personnel	\$0	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$0	\$5,000	\$0	\$0	\$5,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$30,000	\$13,000	\$292,000	\$10,000	\$345,000
Total Direct Costs		\$30,000	\$18,000	\$292,000	\$10,000	\$350,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Federal Funding (not to exceed \$500,000)		\$30,000	\$18,000	\$292,000	\$10,000	\$350,000
Cost share (20% of requested federal funds) ¹		\$6,000	\$3,600	\$58,400	\$2,000	\$70,000
Total Budget (Total Direct Costs + Indirect Costs + Cost Share)		\$36,000	\$21,600	\$350,400	\$12,000	\$420,000
¹ Applicants must include the cost share in the budget even if applying for a cost share waiver. If the applicant is successful and the cost share waiver is approved, it will be removed in pre-award negotiation.						

ABCA/Cleanup Planning:

Finalize ABCA - \$2,500

Site-specific QAPP/H&S Plan - \$5,000

State Historic Preservation Office review - \$22,500 (~180 hrs. @ \$125/hr.)

Total = \$30,000

Community Involvement:

Amended CIP - \$2,500

Public Meetings - \$9,000 Two public meeting, coordinate with Public Health District III and communicate with neighboring businesses and residences regarding cleanup/demolition scheduling (68 hrs. @ \$125/hr.; Supplies @ \$500)

Web update/PSAs - \$1,500 (12 hrs. @ \$125/hr.)

Travel costs for two staff to attend two conferences/trainings - (per person/conference – airfare @ \$750, 3 hotel nights @ \$ 350, meals/incidental @ \$150)

Total = \$18,000

Cleanup/Demolition:

Soil excavation – removal and backfilling – 55 cubic yards @ \$1,200 = \$66,000

Engineering design and overall project monitoring – \$1,000/day, minimum 20 days = \$20,000
Abatement design and air/project monitoring - \$1,000/day; minimum 10 days = \$10,000
Building demolition under wet methods - \$13,500 sf = \$130,000
Disposal of all building debris as ACM waste – 25 dumpsters @ \$1,000 = \$25,000
TCLP analysis of demolition debris to address LBP – 3 TCLP samples @ \$300 = \$900
Subtotal - \$254,000
Contingency – Approximately 15% - \$38,000
Total = \$292,000

Program Management

ACRES reporting, Quarterly Reporting, MBE/WBE forms, Programmatic support for estimated two-year grant period, Closeout Report - \$10,000 (80 hrs. @ \$125/hr.)
Total = \$10,000

Outputs

Outputs will include the final ABCA, amended CIP, site-specific QAPP/H&S plan, updates to the web site, community meetings held and responses to any comments delivered, PSA announcements (radio/newspaper), updated administrative record in public library, solicitation and award of cleanup/demolition contract, start/completion of cleanup/demolition, any final sampling needed, quarterly and final reports. All outputs are projected to be achieved within 18 - 24 months of grant award.

d. Measuring Environmental Results

The City and the QEP will meet a minimum of quarterly (in person or by phone) to assess/track progress and compliance with grant and cleanup schedules. Outputs to be tracked include final ABCA and QAPP (included H&S plan), amended CIP, public meetings held, completion of any responses to public meeting comments needed, subcontracting documents for cleanup/demolition, award of cleanup/demolition subcontract, start/completion of cleanup/demolition, final report(s). Outcomes to be tracked and documented include number of people at public meetings, acres made ready for reuse, dollars leveraged, reduction of blight/crime, increased pedestrians/customers in downtown, and acres of greenspace created. All required information will be entered into EPA's ACRES database.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure

Mayor Simmons serves as the Program Manager for the City of Greenville Brownfields Program. The Mayor will oversee final consultant and contractor selection and all actions required to complete the cleanup. He will be responsible for the timely and successful expenditure of funds and completion of technical, administrative and financial requirements of the project. He is assisted by Everett Chinn, Assistant to the mayor, and Amelia Wicks, City Clerk. In addition to the EPA Community-wide Assessment Grant, Mayor Simmons and his assistants have experience in managing Mississippi DOT, Delta Regional Authority, Federal Aviation Administration (FAA) and Federal Emergency Management (FEMA) grants. The City will hire a Qualified Environmental Professional to assist in managing the grant in accordance with local procurement requirements and federal requirements at 40 CFR 200.317-200.326.

ii. Acquiring Additional Resources

The City will procure additional resources by using the City's approved procurement policy. Contractors will be procured through a competitive bid process which will include a request for qualifications, a mandatory pre-bid meeting and bid opening. A selection committee will be formed to choose the top two or three environmental consultants based on qualifications and prior experience and make a recommendation to the Council. Contractors must make good faith efforts in securing Disadvantaged Business Enterprise (DBE) subcontractors. A contract with the selected firm(s) will be executed once approved by the Council. The City will comply with the EPA's "Professional Service" procurement process (40 CFR 200). Should changes in City leadership or staff occur during the project, the City has presses in place to replace these individuals.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

The City of Greenville received a FY 2013 EPA Brownfields Community-wide Assessment grant. Outputs include 23 Phase I ESAs and five Phase II ESAs. A focus of the grant were properties in proximity to the Mississippi River port. Outcomes include the 250-acre Mat Casting site, assessed with grant funds, which will be used to expand the port; the 54-acre former Chicago Mill site, where an ESA was also conducted, which was sold to the Greenville Port Commission for ancillary port operations; and two new businesses which also opened on sites assessed in the port area each representing between 1 and 5 jobs. ESAs in the downtown and two industrial corridors have resulted in between \$800 and \$100 million of public and private investment including a new \$46.5 million federal courthouse on a brownfields site, a multi-million-dollar hotel renovation, and the \$9.1 million conversion of an old Sears store to loft apartments, including a micro-brewery and restaurant. All outputs and related outcomes were entered into EPA's ACRES database.

The City of Greenville also received a 2017 EPA Brownfields Community-wide Assessment grant. Outputs completed so far include nine Phase I ESAs, two asbestos surveys, one wetland assessment, and four Phase II ESAs. All completed outputs and any related outcomes have been entered into EPA's ACRES database.

(2) Compliance with Grant Requirements

The City complied with work plans, schedule and terms and conditions for the 2013 grant. Quarterly reports and grant deliverables were prepared and submitted to EPA and entered into the ACRES database. The 2013 grant was completed and closed-out 9 months ahead of schedule with no funds remaining.

For the ongoing 2017 grant, the City complied with works plans, schedule, and terms and conditions. Quarterly reports and grant deliverables have been prepared and submitted to EPA and entered into the ACRES database. It is anticipated that the 2017 grant will be completed and closed-out within 12 -18 months ahead of schedule with no funds remaining. As of December 31 2018, the City utilized in excess of 70% of the FY 2017 assessment dollars, and is in the process of developing a FY2019 community-wide Brownfield assessment, which will further its Brownfield program by focusing on blight in the City's burgeoning entertainment district.

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

1. Applicant Eligibility

The City of Greenville, MS is a general purpose unit of local government as defined under 40 CFR Part 31.

2. Previously Awarded Cleanup Grants

Neither the City of Greenville nor the Elks Lodge site has received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Site Ownership

The City of Greenville affirms that it is the sole owner of the site as of October 24, 2016 and which is the subject of this cleanup grant proposal. The City of Greenville further affirms that it will retain ownership of the site through the three year period of performance of the grant.

4. Basic Site Information

- a) Name of the site: former Elks Lodge;
- b) b) Address: 504 Washington Ave. Greenville, Washington County, Mississippi 38701;
- c) Current owner: City of Greenville MS;
- d) NA.

5. Status and History of Contamination at the Site

- a) The site is contaminated with Hazardous Substances (lead and asbestos);
- b) The property was developed in its current condition around 1906 as an Elks Lodge community club house and was vacated in the early 2000s. Since that time the property has been vacant and has become dilapidated and is structurally unsound;
- c) Environmental assessment and hazardous material surveys completed in 2018 revealed the building is contaminated by asbestos and lead-based paint, as well as lead contamination in the shallow soil surrounding portions of the building;
- d) Asbestos containing materials and lead-based paint were common construction materials at the time the building was constructed and/or improved. The lead contamination in the shallow soil likely originates from peeling lead-paint from the on-site structure.

6. Brownfields Site Definition

The site is: a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

7. Environmental Assessment Needed for Cleanup Grant Proposals

A Phase II equivalent asbestos survey was completed by a Mississippi Certified Asbestos Inspector on October 5, 2018. A Phase II equivalent lead-based paint survey was completed on October 5, 2018. A Phase II soil and groundwater assessment is being completed by Cardno in accordance with the American Society of Testing Materials (ASTM) E1903-11. All assessments were funded by the City's 2017 EPA Brownfields Assessment Grant.

8. Enforcement or other Actions

The City of Greenville is not aware of any ongoing or anticipated environmental enforcement or other actions related to the site. The City is not aware of any inquiries, or orders from federal, state, or local government entities regarding the responsibility of any party (including the City) for the contamination, or hazardous substances at the site, including any liens.

9. Sites Requiring a Property-Specific Determination

The site does not require a property-specific determination in order to be eligible for Brownfields Grant funding.

10. Threshold Criterial Related to CERCLA/Petroleum Eligibility

a. Property Ownership Eligibility – Hazardous Substances Sites

i. EXEMPTIONS TO CERCLA LIABILITY

1. Indian Tribes

NA

2. Alaska Village Corporations and Alaska Native Regional Corporations

NA

3. Property Acquired Under Certain Circumstances by Units of State and Local Government

(a) Tax Delinquency: The City of Greenville acquired the property on October 24, 2016 due to significant tax delinquency through a deed of gift from the Mississippi Action for Community Education, Inc. (MACE). In addition to not having the funds to pay the property taxes, MACE did not have the resources to complete the repairs to the building necessary to stabilize and effectively utilize the building.

ii. EXEMPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

1. Publicly Owned Brownfields Sites Acquired Prior to January 11, 2002

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Not applicable as City of Greenville acquired the property on October 24, 2016 due to tax delinquency.

**iii. LANDOWNER LIABILITY PROTECTIONS FROM CERCLA
LIABILITY**

1. Bona Fide Prospective Purchaser Liability Protection
NA

b. Property Ownership Eligibility – Petroleum Sites
NA

11. Cleanup Authority and Oversight Structure

- a. The cleanup and removal of lead-contaminated shallow soil is regulated under MDEQ Groundwater Assessment / Remediation Division (GARD). The cleanup standards are defined in MEDQ Final Brownfields Regulations Subpart II Risk Evaluation Procedures. Specifically, Tier 1 Target Remediation Goals (TRGs) for soil are applicable.

Asbestos is regulated by the AHERA, the Toxic Substances Control Act (TSCA), the Clean Air Act (CAA), and Mississippi Administration Code, Part 2, Chapter 1, Rule 1.8. Further, to protect asbestos abatement workers all asbestos abatement work must be performed in accordance with Occupational Safety and Health Administration (OSHA) asbestos regulations as promulgated in Title 29 of the Code of Federal Regulations (29CFR), Section 1926.1101.

MDEQ regulates and licenses lead paint consultants and workers under Mississippi Administrative Code Part 2 Chapter 9, and notes that lead-containing debris must be handled in accordance with the USEPA RCRA Hazardous Waste Regulations (40 CFR Parts 260 through 274). The Occupational Safety and Health Administration has published regulations regarding worker safety during activities involving lead-based paint abatement. The Construction Standards (29 CFR Part 1926) and the OSHA (29 CFR Part 1910) promulgate a permissible exposure limit for lead construction workers, including workers performing demolition, salvage, or renovation of lead-containing materials at sections 1926.62 and 1910.1025.

The City will contract with a Qualified Environmental Professional to conduct, manage and oversee the cleanup. The QEP procurement process will comply with local, state and federal procurement requirements (2 CFR 200.317 – 200.326).

12. Community Notification

a. Draft Analysis of Brownfields Cleanup Alternatives

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

A draft Analysis of Brownfield Cleanup Alternatives (ABCA) for the former Elks Lodge has been prepared by Cardno, dated January 11, 2019. The community has been allowed the opportunity to comment on the draft proposal which includes the attached draft ABCA.

b. Community Notification Ad

The City published a community notification ad in the Delta Democrat Times newspaper on **January 9, 2019**. The community notification clearly stated:

- that a copy of this grant proposal, including the draft ABCA(s), was available for public review and comment;
- how to comment on the draft proposal;
- where the draft proposal is located (*William Alexander Percy Memorial Library at 341 Main Street, Greenville, MS*); and
- the date and time of a public meeting (*January 16, 2019 from 5:30 PM to 7:00 PM*).

The target community was provided an opportunity to comment on the proposal.

c. Public Meeting

The City held a public meeting to discuss the draft proposal and consider public comments on January 16, 2019 from 5:30 PM to 7:00 PM at William Alexander Percy Memorial Library at 341 Main Street, Greenville, MS. All present were in support of the project due to the dilapidated state of the building. Residents have fond memories of the building, which served as a local gathering spot for dances until its closure. Residents present suggested that the building columns be preserved a feature in the park which is planned to be constructed following the demolition of the building.

d. Submission of Community Notification Documents

Attached are the following required documents:

- a copy of the draft ABCA;
- a copy of the ad (*or equivalent*) that demonstrates notification to the public and solicitation for comments on the proposal;
- the comments or a summary of the comments received;
- the applicant's response to those public comments;
- meeting notes or summary from the public meeting; and
- meeting sign-in sheet.

13. Statutory Cost Share

The City of Greenville is requesting a cost share Hardship Waiver. The City contends that the project cost would be prohibitive if the cost share waiver is not granted. Attached is the required "Hardship Waiver Request" document.

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Required Threshold Attachments

- Draft ABCA
- Copy of the Public Meeting ad
- Screenshot of Public Meeting TV Public Service Announcement
- Public Meeting Summary including comments, response and summary
- Meeting sign-in sheet
- Hardship Waiver Request

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Threshold Attachment

Draft ABCA

DRAFT - Analysis of Brownfield Cleanup Alternatives

Former Elks Lodge
504 Washington Avenue
Greenville, Washington County, Mississippi

January 2019

Prepared for:
City of Greenville
EPA Cooperative Agreement BF-00D60317-0



DRAFT - Analysis of Brownfields Cleanup Alternatives

Prepared for: City of Greenville
340 Main Street
Greenville, Mississippi 38701
EPA Cooperative Agreement BF-00D60317-0



Project Name: **DRAFT - Analysis of Brownfields Cleanup Alternatives**
Former Elks Lodge
504 Washington Avenue
Greenville, Washington County, Mississippi

Submission Date: January 15, 2019

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Appendices

Appendix A Legal Description and Tax Map

Appendix B Structural Evaluation Report

Appendix C Prior Reports

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 Appendix C2 Excerpts from Cardno's November 2018 Phase I ESA

 Appendix C3 Tables and figures from Cardno's On-going Phase II ESA Investigation

DRAFT

1 Background

The City of Greenville, MS (City) was awarded a FY 2017 Environmental Protection Agency (EPA) Brownfield Assessment Grant # BF-00D60317-0 in the amount of \$300,000 to assess properties that will revitalize and redevelop the City.

This document was developed to serve as the EPA's Analysis of Brownfield Cleanup Alternatives (ABCA) for the former Elks Lodge property in the City of Greenville. The subject site was selected for assessment under the FY2017 Brownfield Assessment Grant for its economic value and is located at 504 Washington Avenue in Greenville, Washington County, Mississippi.

The site consists of one parcel totaling approximately 0.24 acres with the Washington County Tax Parcel ID # 10372000000, PPIN #10504 (Alternative Parcel ID #05919-01-008000). A legal description and Washington County tax map is included as **Attachment A**.

On-site improvements of the property include an approximately 13,500 square-foot vacant commercial building that formerly supported an Elks Lodge fraternity clubhouse. The three story building is composed of concrete block units (CMU) on a concrete slab. The remaining portion of the site is landscaped grass adjacent roadways and parking lots, as generally depicted in **Figure 1**.

The subject site historically was identified as undeveloped land as early as the 1880s when it was developed in its current condition around 1906 as the Elks Lodge, a local clubhouse supporting the fraternal order of Elks, which is a group of citizens dedicated to charity. Reportedly the site facility continued to support Elks Lodge meetings into the 2000s when it was vacated. Since then, the property has been vacant and has been dilapidated due to exposure to the elements and lack of maintenance. In July 2016, it was determined that the building is structurally unsound and that it could not be restored. Given this finding, the building is a safety hazard to the general public. A copy of the July 2016 Structural Evaluation report is included as **Attachment B**.

The following are suspected historical activities that could have contributed to soil and/or groundwater contamination at the subject property:

- Asbestos containing building materials
- Lead-based paint on painted surfaces and lead contamination in shallow soil
- Upgradient former gas station
- Upgradient former auto repair / car dealership

Assessment work completed using the referenced assessment grant funds identified impacts from the presence of significant quantities of asbestos and lead paint coated surfaces. In addition, there is potential for off-site contamination from the upgradient former gas station and auto repair / car dealership.

Finally, it should be noted that this ABCA is the basis for a FY2019 EPA Cleanup Grant application. It is proposed that the grant fund the soil removal and abatement / demolition of the site.

2 Regional Setting and Site Characterization

2.1 Physiographic Setting

The site is located in the Mississippi River Alluvial Plain. The Alluvial Plain topography is characterized by flat, agriculturally dominated alluvial floodplain. The Alluvial Plain is comprised of surface sediments underlain by alluvium loam, sand, and gravel only identified along the Mississippi River.

2.2 Site Hydrogeology

Surface water flow from the subject site generally flows to the northwest towards the nearby Mississippi River. Lithology descriptions from the site indicate that the shallow subsurface is composed primarily of alluvium loam. The soil at the subject site consists of Sharkey Clay Series, which consists of clayey alluvium located along the Mississippi delta region. This soil consists of very deep, poorly drained soils, which typically exhibit a low hydraulic conductivity.

Groundwater flow is unknown, but based on surface topography likely flows to the northwest towards the Mississippi River. The depth to groundwater at the subject site was measured to range from 6.5 feet to 10.5 feet below ground surface (bgs). Groundwater flow direction was determined to be towards the northwest.

3 Previous Assessment Activities

This section of the documents summarizes the assessment work completed to date upon which corrective action is based.

3.1 Cardno Asbestos Survey and Lead-Based Paint Survey, October 2018

On behalf of the City of Greenville, through the City's EPA Brownfield Assessment Grant # BF-00D60317-0, Cardno completed an asbestos and lead-based paint survey of the former Elks Lodge at 504 Washington Avenue on October 5, 2018. The surveys were completed by Cardno's subcontractor, Vance Nimrod, P.E., a licensed asbestos and lead-based paint inspector.

Mr. Nimrod completed the inspections in September 2018, and surveyed the entirety of the building, with the exception of areas within the third floor and the roof, which were inaccessible due to the building's deteriorating condition.

The asbestos survey identified the following asbestos containing materials:

- Various floor tiles and underlying mastic located throughout
- Texturing on walling and ceiling located throughout
- Drywall / joint compound walling and ceiling located throughout

Cardno concluded that the material should be abated by a licensed abatement contractor prior to disturbance during renovation or demolition. Considering the building's deteriorating condition, Cardno further recommended that the preferred abatement option would be to demolish the building and manage all debris generated as asbestos containing.

The lead-based paint survey identified the following lead containing painted surfaces:

- Orange paint on wood trim located in the first floor hallway
- White paint on ceiling trim located on the first floor hallway and second floor
- Green paint on first floor back wall
- Yellow paint on 2nd floor bathroom
- Orange paint on third floor north wall

Cardno concluded that these materials be disclosed to any potential building contractors prior to demolition to ensure adequate safety measures are taken. In addition, it is recommended that the building debris be analyzed for lead following toxicity characteristic leachate procedure (TCLP) extraction to determine its waste characterization for disposal purposes prior to its removal.

A copy of Cardno's Asbestos and Lead-Based Paint surveys are included in **Appendix C1**.

3.2 Cardno Phase I ESA, October 2018

On behalf of the City of Greenville, through the City's EPA Brownfield Assessment Grant # BF-00D60317-0, Cardno completed a Phase I Environmental Site Assessment (ESA) on the entire 500 Block along Washington Avenue, which includes the former Elks Lodge at 504 Washington Avenue, on October 24, 2018.

Specifically, the Phase I ESA included seven adjoining parcels encompassing approximately 3.6 acres. The specific sites include the following:

- **504 Washington Avenue and Subject Site:** Former Elks fraternity Lodge, constructed in 1906. This three-story structure is currently vacant. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10372000000, PPIN 10504, and is currently owned by the City of Greenville.
- **508 Washington Avenue:** Concrete slab-on-grade parking lot, previously in association with the Elk Lodge located at 504 Washington Avenue. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10372600000, PPIN 10505, and is currently owned by the City of Greenville.
- **Surface Lot North #1:** located between 508 and 522 Washington Avenue – formerly utilized as a club-house between approximately 1915 and 1950, as well as a slab-on-grade parking lot. According to the Washington county Tax Assessors database, these properties are identified as Parcel ID# 10370800000, PPIN 10502. This lot is currently owned by Mystic Rose Entertainment, Inc., and site access was not provided.
- **Surface Lot #2:** Located north of 504 Washington Avenue – formerly a slab-on-grade parking lot. According to the Washington County Tax Assessor, this property is identified as Parcel ID# 10371400000, PPIN 10503. This lot is currently owned by Boykin AQLICB, LLC.
- **522 Washington Avenue:** Two-story former Greenville Buick-Pontiac dealership, constructed circa 1926. According to the Washington county Tax Assessors database, this property is currently identified as Parcel ID# 10365400000, PPIN 10493. This facility is currently owned by Mystic Rose Entertainment, Inc., and site access was not provided.
- **536 Washington Avenue:** Guaranty Bank & Trust building and associated concrete parking lot – currently in use. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10364800000, PPIN 10492. This property is currently owned by Guaranty Bank & Trust.
- **A single-story and one additional two-story vacant structure:** Located on the northeast portion of the Subject Property. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10365600000, PPIN 30609. This property is currently owned by Mystic Rose Entertainment, Inc., and site access was not provided.

Based on the findings of the Phase I ESA, the following recognized environmental conditions (RECs) were identified:

1. Buick/Pontiac Dealership

The Buick/Pontiac dealership was located at 522 Washington Avenue, and has been a historical automotive repair, parts storage, and vehicle maintenance facility from the late 1920s until the 1980s. During the site inspection, in-ground lifts were identified within the former maintenance area. Based on its current condition and historical use, there is potential from a release from this facility that may require additional investigation.

2. Buick/Pontiac Dealership - USTs

According to interviews and historical records, this facility supported one 800-gallon and one 400-gallon gasoline underground storage tanks (USTs), both installed in the early 1970s and reportedly out of use in the late 1980s. According to the Mississippi Department of

Environmental Quality (MDEQ), the USTs are permanently out of use in the ground and have not been removed. During the site inspection, one vent pipe was located to the south of the north vacant building. Based on its current condition and historic use, there is potential for a release from the USTs that may require additional investigation.

3. Summerlin Gas Station

The Summerlin gas station was historically located at 536 Washington Avenue (location of the current Guaranty Bank and Trust Company). This facility operated between approximately 1940 and 1960. No records or information of the gas stations underground storage tanks (USTs) were identified with Mississippi Department of Environmental Quality (MDEQ). Reportedly the USTs were removed with the development of the current building in the early 1960s. Based on its historic use, there is potential for a release from this facility that may require additional investigation.

4. Mystic Rose Entertainment, Inc.

The current owner of three of the seven parcels included in this report, did not grant Cardno access to the former automotive dealership located at 522 Washington Street and the vacant structures located along the northeastern portion of the Subject Property during this assessment. Given the historic automotive related uses, and potentially hazardous nature of these facilities, Cardno considers this lack of access as a REC in connection with the Subject Property.

Cardno recommended the interior of the Buick/Pontiac dealership be inspected by an environmental professional to determine if there are additional RECs, and that environmental soil and groundwater testing should be conducted prior to address the potential from contamination from the historic auto repair and gas station.

In addition, Cardno reviewed the prior October 2018 asbestos and lead-based paint survey report, and reiterated its recommendations as outlined in Section 3.1.

Excerpts of Cardno's Phase I ESA is included in **Appendix B2**.

3.3 Cardno Phase II ESA, In Progress, January 2019

In order to address the RECs as outlined in previous Phase I ESA, Cardno was requested to complete a Phase II ESA of the four parcels that access was provided, including the Elks Lodge at 504 Washington Avenue. Field activities were completed in December 2018, and the report is currently in progress. Cardno installed nine soil borings (B-1 through B-9) throughout the property, including four soil borings at the Elks Lodge (B-6 through B-9). The soil samples collected around the Elk Lodge were analyzed for lead at depths between 0-2 feet bgs, and collected for lead at depths between 2-5 feet bgs and placed on laboratory hold pending the findings of the 0-2 feet bgs analysis. Overall, fourteen soil samples were collected for a variety of analysis.

Organic vapor analysis (OVA) readings were collected throughout the soil columns of the soil borings, and soil was analyzed for a variety of contaminants including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), 8 Resource Conservation and Recovery Act (RCRA) metals including lead.

Four of these borings were converted to monitoring wells (MW-1 through MW-4), including one at the Elks Lodge (MW-4). Groundwater was analyzed for similar constituents as the soil samples.

Groundwater depth ranged between 6.5 feet to 10.5 feet bgs and groundwater flow direction was determined to be towards the northwest.

Minor VOC contamination was identified in the soil, but below the applicable Mississippi Department of Environmental Quality (MDEQ) Target Remediation Goals (TRGs). No SVOC or PCB contamination was identified in the soil or groundwater. No VOC contamination was identified in the groundwater.

Arsenic contamination was identified in five of the soil samples (B-1 through B-5) collected, ranging from 3.45 to 5.76 milligrams per kilogram (mg/Kg). However, according to "*Arsenic Concentrations in Selected Soils and Parent Materials in Mississippi*" (Pettry and Switzer 2001), naturally occurring background arsenic concentrations in the shallow soil located throughout the Mississippi Delta area range from 2.86 and 26.85 mg/Kg (highest in the state), with an average of 15.02 mg/Kg. Therefore, arsenic concentrations appear to be within naturally occurring background concentrations for this part of Mississippi and are not considered an exceedance and no further action is required with respect to arsenic.

Lead contamination was identified in to shallow soil samples collected around the Elks Lodge, B-6 @ 0.5 feet bgs and B-8 @ 1 foot bgs, with concentrations of 1,190 mg/Kg and 513 mg/Kg, respectively. This exceeds the MDEQ TRG concentration of 400 mg/Kg. Cardno analyzed the deeper soil samples (B-6 @ 3.5 feet bgs and B-8 @ 3 feet bgs) for lead, and identified minor contamination below the MDEQ TRG. Minor lead and other 8 RCRA metals were identified in the remaining soil samples, but below their respective MDEQ TRGs. A soil borings with lead concentration above TRGs are depicted in **Figure 2**.

Minor metal contamination was identified in the groundwater samples collected, and is currently still be evaluated.

Cardno will recommend that the identified lead contamination in the shallow soil at the Elks Lodge should be reported to MDEQ for their evaluation. Further, it is proposed that removal and proper disposal of the contaminated soil coincide with building demolition, as it is likely that the presence of lead in the soil is associated with the deteriorated lead-based paint on the exterior of the building. The report is still in progress, but tables of the Phase II ESA findings, maps with soil boring and monitoring well locations, and soil contamination locations are included as **Appendix B3**.

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4 Exposure Analysis

4.1 Evaluation

Preparation of an ABCA requires an evaluation be made as to the possible corrective actions and their respective costs to remedy effected areas. Not all remedies are physical or chemical and may include other types of remedies such as institutional controls (e.g. restriction on residential development recorded on the deed). Excess public risk requires four factors, all of which must be present to produce excess risk from contaminants at the site. These are:

- A chemical with sufficient toxicity to do harm (whether acute or chronic);
- A sufficient quantity of the chemical to be toxic and do harm;
- A receptor on which to do harm; and
- A pathway by which a sufficient amount of the contaminant can actually reach a receptor and do harm.

Corrective actions to remedy affected areas rarely eliminate all chemicals of concern or hazardous building materials. It is generally the intent to remove/abate, treat or immobilize/encapsulate impacted media or hazardous building materials to levels producing an acceptable risk to human health and the environment. The degree of acceptable risk has to be determined by the public through legislative and regulatory processes. This has been accomplished by the development and implementation of rules at the Federal, State, and Local levels.

4.2 Exposure Pathways

In order for possible contaminants of concern to do harm to public health or the environment, they must occupy a point of exposure accessible to the population at risk. Compounds to which populations are not currently, nor in the future likely to be exposed via complete exposure pathways do not constitute a probable condition of elevated risk.

The two potential receptor populations evaluated are:

- Residents – persons who reside near the property; and
- Construction workers during the potential redevelopment.

During the prior assessment activities, lead contamination was identified at concentrations above its respective MDEQ TRG.

For each of the potential receptors being considered, the applicable exposure pathway of concern is direct contact with soil, damaged asbestos, and peeling lead-paint via incidental ingestion, dermal contact, and/or inhalation of particulates. Environmental impacts have been confirmed in the shallow vadose zone soil, and in through the building materials. As a result, applicable exposure pathways are related primarily to ingestion and inhalation, or dermal contact to soils or buried debris. Further, because this site is open to the public, conservative exposure assumptions are considered for each of these exposure pathways.

5 Brownfield Cleanup Alternatives

The primary objective of the cleanup alternatives is to reduce or prevent potential risk to human health and/or the environment from site contaminants and/or hazardous building materials used in the demolition and redevelopment of the former Elks Lodge. The cleanup program which is implemented will facilitate the demolition and redevelopment activities. The goal is to demolish the property and redevelop the property as a community greenspace. Again, the building is in disrepair and is a public hazard.

Based on the available inspection information, prior assessment activities, and the proposed redevelopment plans, the following remedial alternatives were identified and evaluated based on feasibility, effectiveness, and cost.

5.1 Asbestos and Lead-Paint Removal

5.1.1 Alternative 1 - No Action

The no action alternative is included as a baseline comparison to other remedial alternatives. The no action alternative assumes no action is taken and is not a valid option for the site, given the objectives of the demolition and redevelopment without first abating the asbestos and lead paint is contrary to established regulations.

5.1.2 Alternative 2 - Encapsulation and Partial Abatement

The encapsulation alternative of the asbestos and LBP would entail the complete enclosure of hazardous materials with another material to prevent access. The partial abatement would include the removal of all the damaged or deteriorating ACM and LBP. However, both options would ultimately require that the building and some, if not all, hazardous materials remain on site and therefore is not a valid option for the site, given the likely objectives of the demolition and redevelopment.

5.1.3 Alternative 3 - Full Abatement

The full abatement alternative would be attempted for the removal of all LBP and ACMs in accordance with applicable regulations. However, given the deteriorating condition of the building, it is not possible to safely remove all hazardous materials and some would remain on site, and therefore is not a valid option for the site, given the likely objectives of the demolition and redevelopment.

5.1.4 Alternative 4 - Demolition of the Building as ACM

This alternative would entail the demolition of the building with all building debris treated as asbestos containing materials. In addition, the building debris would be characterized for lead contamination via TCLP analysis, and all building debris would be adequately disposed of as asbestos and/or lead containing materials at an appropriate landfill.

Feasibility: This alternative is considered feasible given the site conditions. All demolition activities would be conducted under EPA approved wet methods to prevent the release of asbestos fibers and lead dust impacting human health and/or the environment.

Effectiveness: Removal of contaminated material from a site is typically the most effective type of remediation, regardless of contaminant type.

Cost: The estimated cost to implement this strategy ranges from approximately \$130,000 to \$180,000. Actual costs will be based on any necessary site restoration and final contractor cost estimates if selected as the preferred alternative.

5.2 Soil Remediation

Lead contaminated soil was identified around the exterior southwest and northwest portions of the site, and totals approximately 1,000 square feet to a depth of at least 1.5 feet bgs, for a total removal of approximately 55 cubic yards. This lead contaminated soil is located in an openly public area with no access restrictions, and is an environmental hazard to the general public.

5.2.1 Alternative 1 - No Action

The no action alternative is included as a baseline comparison to other remedial alternatives. The no action alternative assumes no action is taken and is not a valid option for the site, given the hazards to human health and the environmental and the likely regulatory requirement to address the soil contamination.

5.2.2 Alternative 2 – Engineering Controls

Engineering controls include placing an impermeable barrier to cover the contaminated soils. This barrier does not clean up the contaminated material. Instead, this isolates the contaminated soil and keeps it in place so it will not come into contact with people or the environment.

Either two feet of clean soil cover, or additional impermeable pavement would be considered as an engineering control to prevent direct exposure. Once the additional cap and cover is implemented, an Engineering Control Maintenance Plan (ECMP) would be developed and institutional controls would be implemented to document the engineering controls and ECMP process.

Feasibility: This alternative is considered feasible throughout most of the impacted area; however, covering of unpaved areas is not practical as it would result in a two foot elevation change and an uneven land surface. This would be difficult to maintain, and not readily allow the site to be used as greenspace.

Effectiveness: This alternative is generally effective in controlling the potential exposure to impacted soils, as long as the environmental control is adequately maintained. However, the resulting uneven land surface in soil cover areas will limit the integrity of a soil cap system. As a result, soil excavation or impermeable pavement may be required to ensure effectiveness in these areas.

Cost: The capital costs to refine the delineation of soil impacts, and to provide additional soil cap or pavement for remaining areas of the site is estimated at roughly \$15,000 to \$20,000 for the purpose of alternatives evaluation in this ABCA. Actual costs will be based on final site design and contractor bids. Please note that additional costs would be required to implement the ECMP.

5.2.3 Alternative 3 – Excavation, Disposal, and Backfill

In this alternative, additional sampling to confirm the vertical and horizontal extent of impacted soil is anticipated, either prior to excavation or as confirmatory sampling during excavation. Once delineated, the impacted soil would be excavated to the depth where no impacts are evident. At this time, lead impacts are documented to at least one foot below ground surface around the southwest and northwest portions of the former Elks Lodge. If impacts are encountered below these depths,

then significant quantities of additional soil excavation may be required to achieve unconditional closure status.

Feasibility: This alternative is considered feasible.

Effectiveness: Removal of contaminated material from a site is typically the most effective type of remediation, regardless of contaminant type.

Cost: At this time, a total area of 1,000 square feet is designated as lead impacted to a depth of up to 1.5 feet bgs (**Figure 3**). Assuming excavation remains within these limits, the estimated cost to implement this strategy ranges from approximately \$50,000 to \$60,000. Actual costs will be based on the extent of contaminated soil removed from the site, any necessary site restoration, and final contractor cost estimates if selected as the preferred alternative.

DRAFT

6 Recommended Cleanup Alternative

6.1 Abatement of ACM and LBP

Selected Action: Demolition of Building as ACM

The recommended cleanup alternative is the demolition of the building as asbestos containing material. The demolition must be conducted by a licensed demolition contractor who is also licensed in asbestos and lead-based paint abatement. All demolition activities will be conducted under EPA approved wet methods to limit the dispersion of asbestos fibers and lead impacted dust. All debris will be collected under wet conditions and disposed of as hazardous waste at a regulated landfill. Prior to disposal, a lead TCLP sample will be collected to determine the waste characterization with respect to lead contamination.

6.2 Soil Remediation

Selected Action: Soil Excavation

Excavation

The documented soil impacts are located in an unpaved and uncovered portion of the property adjacent the Elks Lodge; these areas are highlighted in **Figure 3**. For the lead contamination, the excavation will be approximately 1,000 square feet and extend to a depth of at least 1.5 feet bgs, for a total removal of approximately 55 cubic yards. At this depth, confirmation samples will be collected along the sidewalls of the excavation every 25 linear feet and along the bottom every 500 square feet to determine if impacts still exists. If limited impacts are detected, then the excavation will be extended at least one additional foot and confirmation samples collected again. This will continue until sampling confirms that the limits of the contamination have been excavated.

Backfill and Soil Management

It is anticipated that the soil removed from the designated excavation areas will be temporarily stockpiled onsite and composite samples collected to support offsite disposal. Once the laboratory analyses are evaluated and the soil approved for disposal, the material will be shipped to a subtitle D landfill.

The source of clean backfill will be sampled to document no environmental impacts. The stockpiled clean fill will then be added to the excavation areas in 1 to 2 foot lifts, and compacted to a condition similar to that encountered prior to excavation. At that time, the surface of the backfill areas will be hydroseeded to promote vegetative cover and to prevent erosion of the clean fill cover. The primary maintenance activity associated with the excavation areas will be maintenance of the new grass.

6.3 Remedial Costs Analysis

The goal of the project is to address the environmental concerns associated with the building so that the demolition can move forward. Provided below is a summary of costs associated with the demolition and disposal of all building debris as regulated asbestos containing materials and excavation of contaminated soil so that the financial limitations can be evaluated and balanced with respect to available funds provided by an EPA Cleanup Grant and other sources. Based on project objectives, no other alternatives are presented or analyzed.

Activity	Task	Estimated Quantity	Unit Price	Cost
Asbestos / LBP Abatement	Abatement design and air/project monitoring	Per day cost, minimum 10 days	\$1,000	\$10,000
	Building Demolition under Wet Methods	13,500 square feet	N/A	\$110,000
	Disposal of all building debris as ACM waste	25 dumpsters	\$1,000	\$25,000
	TCLP analysis of demolition debris to address lead-based paint	10 TCLP samples	\$300	\$3,000
Soil Excavation	Soil excavation of lead – removal and backfilling	55 cubic yards	\$1,000	\$55,000
	Engineering design and overall project monitoring	20 days	\$1,000	\$20,000
Subtotal				\$223,000
Contingency (15%)				\$32,420
Total				\$256,450

Please note that these costs represent an estimate of probable costs.

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7 Applicable Regulations and Cleanup Standards

7.1 Cleanup Standards

7.1.1 Asbestos and Lead-Based Paint

Though cancer risk from exposure to asbestos is most appropriately viewed as a chronic concern, short-term standards have been established by OSHA's permissible exposure limits (PEL) to limit exposures to workers in the workplace. There are two types of short-term limits, as follows:

- Short-term exposure limit (STEL) – 1.0 fibers per cubic centimeter (f/cc), analyzed by Phase Contract Microscopy (PCM)
- 8-Hr Time weighted average (TWA) – 0.1 f/cc, analyzed by PCM

For LBP, the OSHA limits lead exposure to workers in the workplace with the following standard:

- 8-Hr TWA – 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)

EPA Asbestos Hazard Emergency Response Act (AHERA) regulations (40 CFR 763) require aggressive clearance sampling after asbestos abatement activities. If necessary, air clearance samples are collected according to the standard methods set forth in Appendix A of Subpart E of 40 CFR Part 763. The clearance criteria's as set forth in this regulation are:

- PCM clearance: 0.01 f/cc
- Transition Electron Microscopy (TEM) clearance: 70 structures per square millimeter ($\text{structures}/\text{mm}^2$)

Although AHERA regulations apply to abatement in schools, the same standards are generally used for all abatement projects.

7.1.2 Contaminated Soil

Corrective action concentrations for soil are regulated under MDEQ's Groundwater Assessment / Remediation Division (GARD) Final Brownfields Regulations Subpart II Risk Evaluation Procedures. Specifically, Tiers 1 - 3 Target Remediation Goals (TRGs) for soil and groundwater are listed in which any exceedance is required to be reported by the current property owner to MDEQ.

A Tier 1 Evaluation is the comparison of site-specific data to "look-up" table of chemical-specific TRGs. Specific TRG concentrations have been determined to be protective of human health and the environment for restrictive use and unrestrictive use of a site. Given the site conditions, proximity to residential areas, and future development as greenspace, the Elks Lodge qualifies for unrestrictive Tier 1 TRG cleanup levels. For lead, the MDEQ Tier 1 cleanup standard is 400 mg/Kg.

Upon completion of all cleanup activities, a Corrective Action Plan (CAP) outlining the excavation activities and confirmation samples is required to be submitted to MDEQ GARD for their review. Upon their review and approval, MDEQ GARD will issue out a no further action (NFA) determination.

7.2 Applicable Laws and Regulations

7.2.1 Asbestos Laws and Regulations

Asbestos is regulated by the AHERA, the Toxic Substances Control Act (TSCA), the Clean Air Act (CAA), and Mississippi Administration Code, Part 2, Chapter 1, Rule 1.8. Further, to protect asbestos abatement workers all asbestos abatement work must be performed in accordance with Occupational Safety and Health Administration (OSHA) asbestos regulations as promulgated in Title 29 of the Code of Federal Regulations (29CFR), Section 1926.1101.

The following work practices should be followed whenever demolition/renovation activities involving asbestos-containing materials occur:

- Prepare abatement specifications by a EPA licensed Asbestos Designer;
- Notify MDEQ of intention to demolish/renovate by the required notification form;
- Remove all asbestos-containing materials from facility being demolished or renovated before any disruptive activity begins;
- Handle and dispose of all asbestos-containing materials in an approved manner (USEPA, 2006a; Asbestos/NESHAP Regulated Asbestos-Containing Materials Guidance);
- Monitor asbestos abatement activities by a EPA and MDEQ Licensed Asbestos Abatement Supervisor;
- Perform air clearance testing upon completion of asbestos-containing materials abatement; and
- Prepare an asbestos abatement Compliance Report.

7.2.2 Lead-Based Paint Laws and Regulations

Lead-based paint in pre-1978 housing and children-occupied buildings is regulated under the authority of the Toxic Substances and Control Act (TSCA; 15 U.S.C. 2601 et seq.) as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992, generally referred to as Title X (of The Housing and Community Act of 1992 - Public Law 102-550). Title X mandates the training, certification and licensing of lead-based paint abatement contractors, inspectors, risk assessors, and the training and certification of abatement workers and project designers. The Act also amended the Toxic Substances Control Act section 402 & 403. The provisions of Title X apply to residential buildings and child-occupied facilities.

MDEQ regulates and licenses lead paint consultants and workers under Mississippi Administrative Code Part 2 Chapter 9, and notes that lead-containing debris must be handled in accordance with the USEPA RCRA Hazardous Waste Regulations (40 CFR Parts 260 through 274).

The Occupational Safety and Health Administration has published regulations regarding worker safety during activities involving lead-based paint abatement. The Construction Standards (29 CFR Part 1926) and the OSHA (29 CFR Part 1910) promulgate a permissible exposure limit for lead

construction workers, including workers performing demolition, salvage, or renovation of lead-containing materials at sections 1926.62 and 1910.1025 as follows:

“The employer shall assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 $\mu\text{g}/\text{m}^3$) averaged over an 8-hour period.” (29 CFR 1926.62) Additional regulations under these chapters address other worker safety precautions such as respiratory protection programs, work practices, and medical monitoring. Lead-based paint debris (material containing or surfaced with lead-based-paint) from commercial buildings may be classified as hazardous waste if lead concentrations exceed the Toxicity Characteristic Rule (40 CFR 261.24, 40 CFR 262.11) concentration limit of 5.0 milligram per liter (mg/L) in sample extract prepared according to the Toxicity Characteristic Leaching Procedure, test Method 1311 in “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” EPA Publication SW-846.

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8 Certification

I, Douglas Strait, Professional Engineer (PE) #041500, certify that I currently hold an active license in the State of Georgia and am competent through education and experience to provide the geologic services contained in this report. I further certify that this report was prepared by me or under my direct supervision.

Prepared by:

Douglas Strait, PE
Georgia Professional Engineer # 041500

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DRAFT

LEGEND



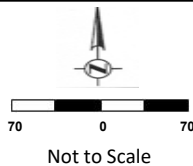
Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Source: Google Earth



"This is not a map of survey."



ABCA
Elks Lodge – 504 Washington Avenue
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 1
Site Boundary Map

LEGEND



Cardno's Phase II ESA Soil
Boring Locations

B-8

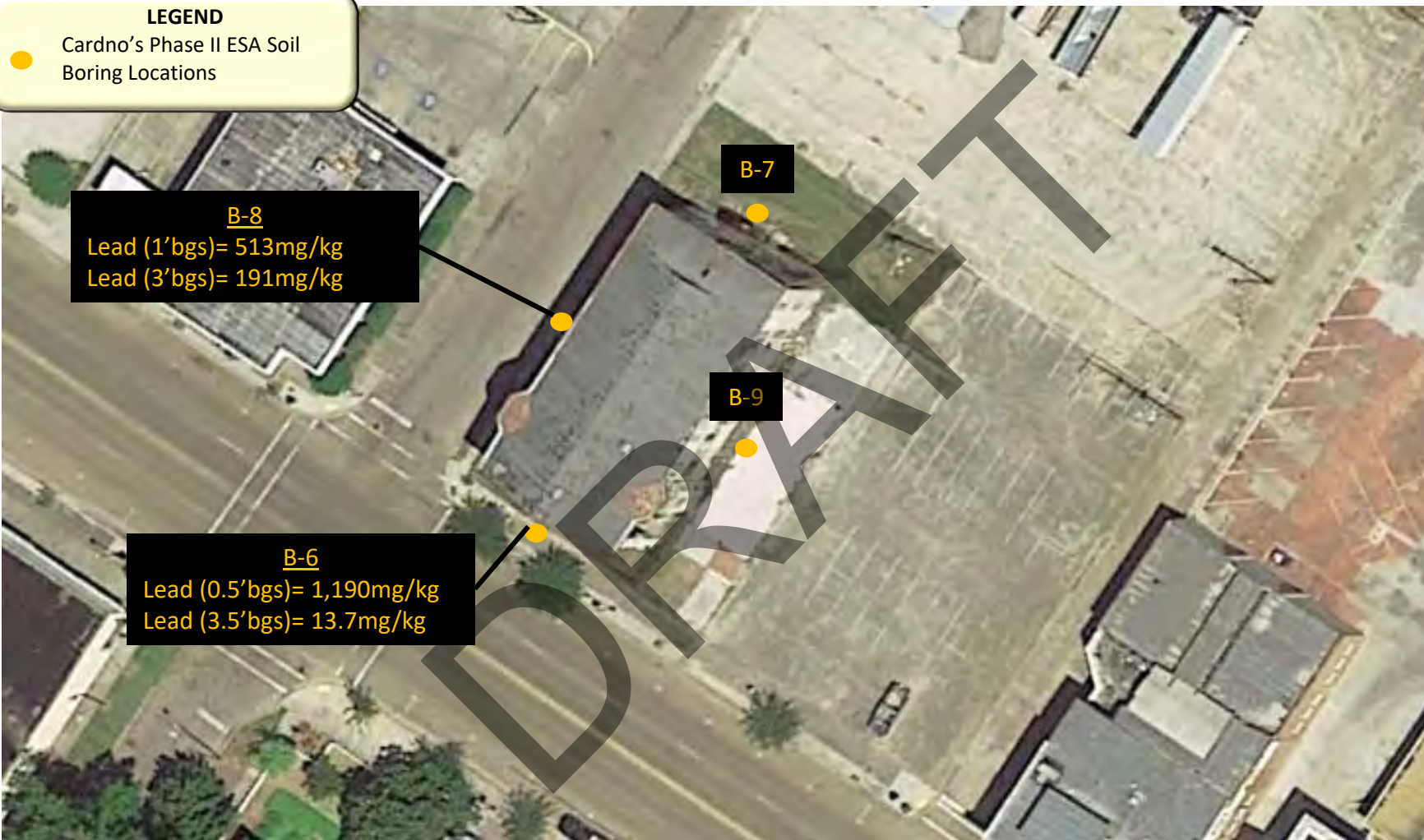
Lead (1'bgs)= 513mg/kg
Lead (3'bgs)= 191mg/kg

B-7

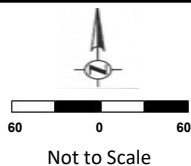
B-9

B-6

Lead (0.5'bgs)= 1,190mg/kg
Lead (3.5'bgs)= 13.7mg/kg



"This is not a map of survey."



ABCA
Elks Lodge – 504 Washington Avenue
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 2
Soil Boring Location Map

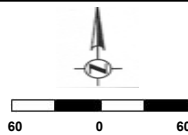
LEGEND



Approximate area of soil removal
(5' width x 1.5' depth)



"This is not a map of survey."



Not to Scale

ABCA
Elks Lodge – 504 Washington Avenue
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 3
Soil Removal Map

Appendix A

Legal Description and Tax Map

DRAFT

EXHIBIT A

Book 201601 Page 5168

Deed
10/28/2016 11:56:26 AM

Lot 17 and a part of Lot 16 of the Blanton Park Block of the Third Addition to the City of Greenville, Washington County, Mississippi, as the same appears upon a plat recorded in Book E-3 at page 765 of the Land Records of Washington County, Mississippi, described by metes and bounds as follows: Commencing at an iron pipe marking the southwesterly corner of Lot 17 of the said Blanton Park Block, which point is the point of beginning; thence run in an easterly direction along the southerly boundary of said Block, which is the northerly boundary of Washington Avenue, 69.58 feet to a point; thence run in a northerly direction perpendicular to the northerly boundary of Washington Avenue a distance of 150.00 feet to a point; thence run a westerly direction, parallel to the northerly boundary of Washington Avenue, 69.58 feet to an old iron rod; thence run in a southerly direction, perpendicular to the northerly boundary of Washington Avenue, 150.00 feet to the point of beginning, subject to that certain easement for ingress and egress across the northerly 12 feet thereof conveyed by Kenneth U. Levy to Kossman Insurance and Mortgage Company by instrument dated February 8, 1962, filed for record on February 14, 1962, of record in Book 820 at page 269 of the Land Records of Washington County, Mississippi.

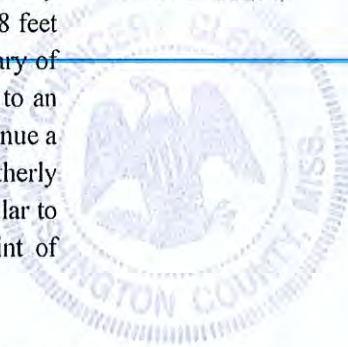
Together with all easements or appurtenances thereunto belonging or appertaining, specifically including, but not limited to, the following:

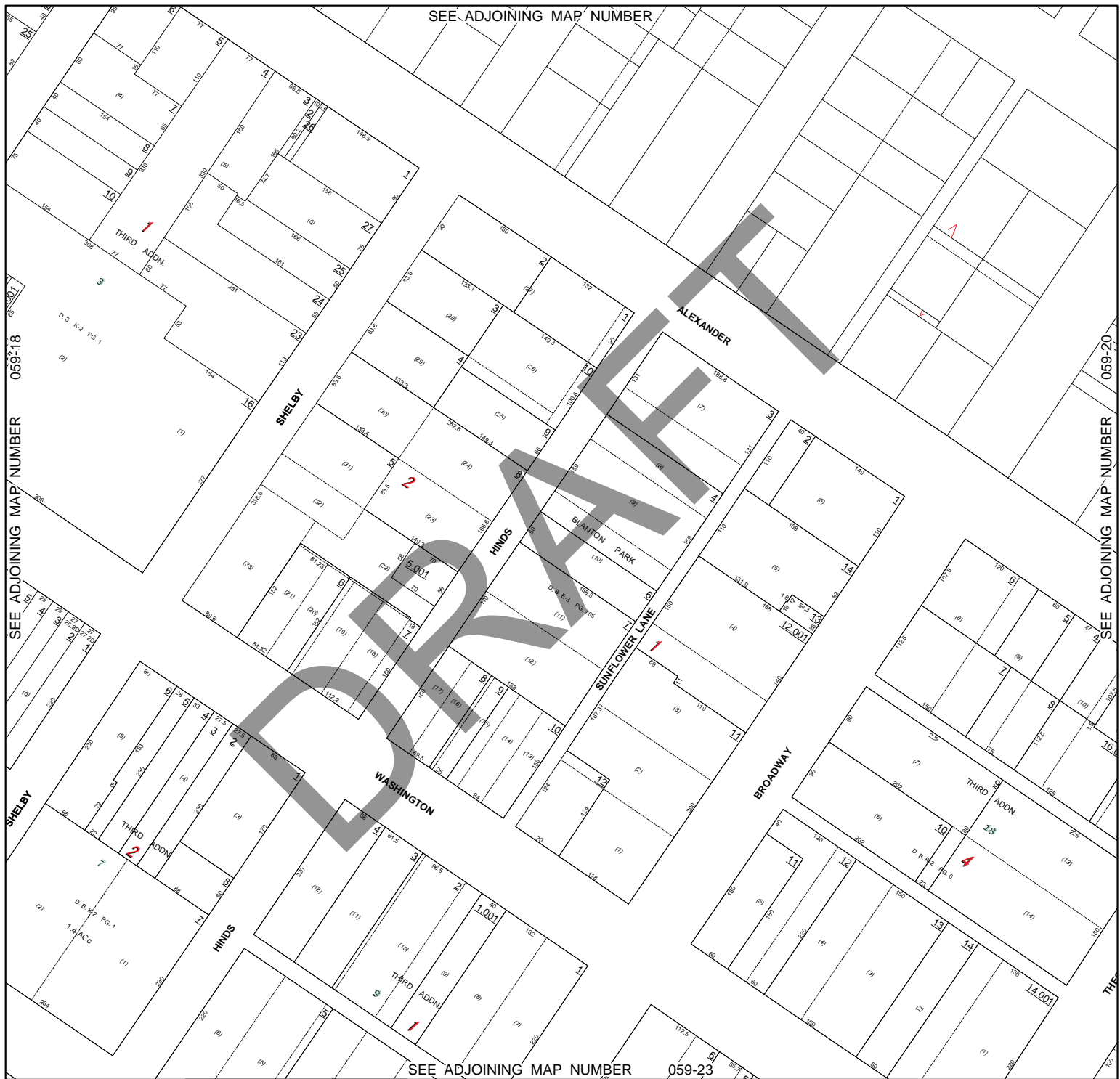
- (1) That certain easement for a private way 12 feet in width across the northerly 12 feet of that part of Lots 15 and 16 of the Blanton Park Block of the Third Addition to the City of Greenville, Washington County, Mississippi, as the same appears upon a plat recorded in Book E-3 at page 765 of the Land Records of Washington County, Miss., reserved by Kenneth H. Levy by instrument dated February 8, 1962, filed for record on February 14, 1962, of record in Book 820 at page 269 of the Land Records of said County and State, more particularly described as follows, to-wit:

An easement for a private way 12 feet in width across the northerly 12 feet of that certain parcel of land described as commencing at an iron pipe marking the southwesterly corner of Lot 17 of the said Blanton Park Block; thence run in an easterly direction along the southerly boundary of said Block, which is the northerly boundary of Washington Avenue, 69.58 feet to a point which is the point of beginning; thence continue along the southerly boundary of said Block and the northerly boundary of Washington Avenue a distance of 25.0 feet to an iron pipe; thence northerly perpendicular to the northerly boundary of Washington Avenue a distance of 150.0 feet to an iron pipe; thence in a westerly direction parallel to the northerly boundary of Washington Avenue, a distance of 25.0 feet to a point; thence perpendicular to the northerly boundary of Washington Avenue, a distance of 150.0 feet to the point of beginning.

- (2) All of grantor's right, title and interest in or to the private way designated as Hinds Street upon a plat recorded in Book E-3 at page 765 of the Land Records of Washington County, Mississippi, specifically including, but not limited to, all rights reserved by Kenneth H. Levy in that certain instrument entitled "Conveyance of Right-of-Way and Easement", executed by Ralph G. Levy, Attorney-in-fact for Kenneth H. Levy, and by certain other parties in favor of the City of Greenville, Mississippi, a municipal corporation, dated April 26, 1962, filed for record on May 10, 1962, of record in Book 832 at page 147 of the Land Records of Washington County, Mississippi. Among other rights specifically reserved in said instrument dated April 26, 1962, is the exclusive right of parallel parking on and over the portion of the street property described therein which lies contiguous to Lot 17 of the Blanton Park Block of the Third Addition to the City of Greenville, Washington County, Mississippi, as said lot appears upon a plat recorded in Land Deed Book E-3 at page 765 of the Land Records of Washington County, Mississippi, said reservation having been for the said Kenneth H. Levy, his agents, employees, guests and business invitees and for their successors in interest.

Washington County, MS
I certify this instrument was filed
on 10/28/2016 11:56:26 AM
and recorded in the
Book 201601 Page 5166 - 5168
Martha H. Howard
Chancery Clerk





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REPRODUCTION OR ALTERATION IN WHOLE OR
IN PART WITHOUT THE WRITTEN PERMISSION
OF THE TAX ASSESSOR AND/OR THE BOARD
OF SUPERVISORS IS STRICTLY PROHIBITED

Legend
--- Lot/Track Line --- State ROW --- Parcel --- UNK
--- US ROW --- County Boundary --- Railroad --- Water Property
--- State Boundary --- County --- Section
--- City ROW --- Parcel --- Township

Map Key		
059-18	059-19	059-20
059-22	059-23	059-24

N
Scale: 1" = 50'

OWNERSHIP MAP
Washington County, Mississippi

Section: 4
Township: 18N
Range: 8W

Map Number:
059-19

Appendix B

Structural Evaluation Report

DRAFT



W. Mark Watson, PE, LLC

P.O. Box 347
Shannon, MS 38868
662-891-8567 phone
662-767-3047 fax
www.markwatsonpe.com

July 25, 2016

Mr. Andrew N. Alexander III, Esq.
Lake Tindall, LLP
P.O. Box 918
Greenville, MS 38702-0918

Reference: Elk's Lodge Building
Structural Evaluation
504 Washington Avenue
Greenville, Mississippi
WMW Job No: 2016-150

Dear Mr. Alexander:

On Thursday, June 30, 2016, at your request, a visual structural evaluation was conducted on the old Elk's Lodge. The purpose of the survey was to examine the building in order to determine its overall structural condition as part of a study for possible renovations and to offer general recommendations as needed.

Attached herein is commentary discussing my findings, conclusions, and recommendations.

I appreciate the opportunity to provide you and The City of Greenville with structural engineering services. Should you have any questions, please feel free to contact me.

Sincerely,

W. Mark Watson, PE, LLC

Mark Watson, PE, CBIE
MS Reg No 13616
(Certified Building Inspection Engineer)



BUILDING DESCRIPTION:

The Elk's Lodge is a three story tall, masonry structure, partially with split faced concrete block and partially with multi-wythe brick, constructed with a recessed concrete slab on grade. Original construction used wood floor framing at the second and third floor levels as well as wood roof and ceiling joist framing. Sometime later, structural steel beams and columns were added underneath the second floor framing and part of the roof framing. The original porches and balconies had been removed. The building was reportedly constructed in 1906 and 1907 and appears to have been vacant for decades. For the purposes of this report, the building was assumed to be oriented lengthways in the north to south direction. The building size is 92 feet long by 50 feet wide with an eave height that was 38 feet tall. Following is a brief description posted by the Mississippi Department of Archives & History (MDAH).

“In its heyday, the Benevolent and Protective Order of the Elk, No. 148 Lodge, also known as the “Cotton Pickers” Elk Lodge, was the social center for Greenville. Originally chartered in 1890, the “Cotton Pickers” built their once proud Neo-classic home in Greenville in 1906 and opened the doors in 1907. *The Greenville Times* of February 16, 1907, described the building as including a billiard hall, a barber shop, and a full library decorated with rare and expensive oil paintings and as being lighted by both gas and electricity. The “Cotton Pickers” Lodge has been converted many times since the Elks left. Now the home of the Mississippi Action for Community Education (M.A.C.E.), an organization committed to the preservation and education of African-American culture, the building is in urgent need of help. In the 1990’s, M.A.C.E. and other concerned citizens saved the building several times from the bulldozer and had the building designated a Mississippi Landmark in 2002. If care is not taken soon to restore the building, the city could force demolition.”

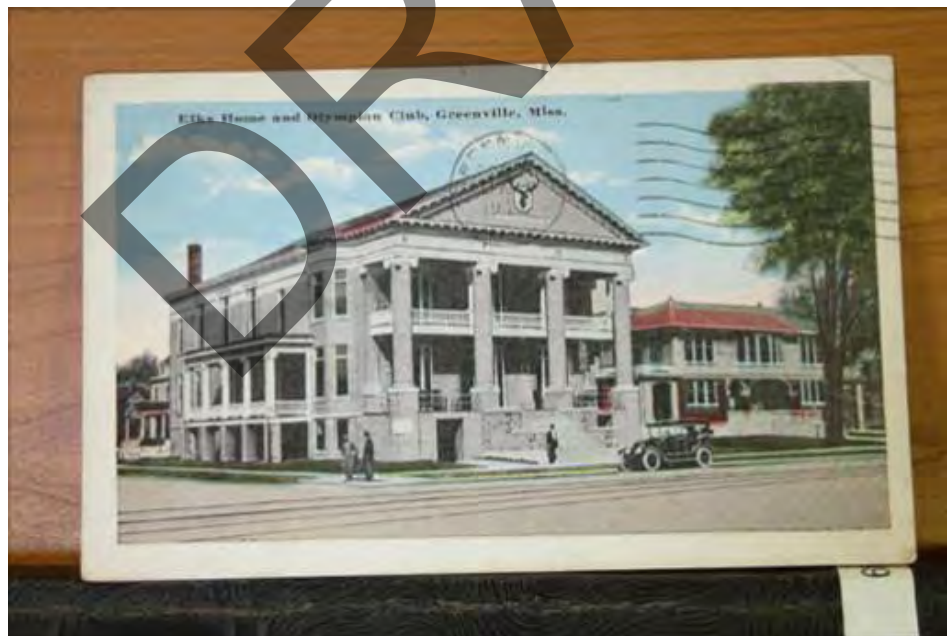


Figure 1: Postcard image from MDAH.



Figures 2 - 5

Figure 2: South end (front) elevation. Figure 3: East side elevation. Figure 4: North end (rear) elevation. Figure 5: West side elevation

OBSERVATIONS:

Exterior observations found severe movement of all perimeter side walls. Moderate sized diagonal cracks accompanied by severe arch failure were present above and below most windows. Continuously reinforced bond beams had originally been installed as headers above the windows and also had been used to support the second and third floor framing. Most bond beams had either split or broken. Many had completely lost their split face block shell, exposing the concrete infill and its reinforcing bars. Severe degradation to the rebar and concrete infill was common. The upper wall sections (near the roof framing level) converted to a multi-wythe brick wall system. This upper brick section had partially collapsed in many locations with bricks falling out and laterally displacing the original frieze trim. This was accompanied by visible roof surface irregularities.



Figures 6 – 9

Figures 6 – 8: Examples of outward frieze movement due to upper brick wall sections collapsing and falling out. Figure 9: Small pile of bricks that fell out from upper wall section.



Figures 10 – 15

Figures 10 and 11: Typical examples of upper brick wall sections collapsing and falling out. Figure 12: Broken bond beams along second floor level. Figures 13 – 15: Bond beam failure with exposed concrete infill and deteriorated rebar. Note also the ongoing “arch failure” in figure 15 between the two sets of windows as exhibited by the diagonal separation cracks and the visible deflection.



Figure 16



Figure 17

Additional examples of broken header support beams and wall movement.

Interior observations found that severe water infiltration from roof leaks, wall leaks, window openings, and surface water seepage, had been occurring for an extended period of time. The ground floor level was very damp and the interior finishes had been completely destroyed by long-term moisture. This was accompanied by moderate to severe floor slab and foundation settlement. The second floor contained a large open assembly type room in the center section of the building. Most of the second floor framing for the whole building had severely deteriorated and partially collapsed. The third floor space contained a small theater on the north half with various office type rooms on the south half. Approximately 60% of the third floor framing had severely deteriorated and was again accompanied by areas of partial collapse. These unstable and dangerous floor conditions limited access inside the building's upper floors. The southern half sections were mostly not accessible. Roof framing utilized large, multi-member truss girders that in turn supported the rafters and ceiling joists. Heavy deterioration to the roof framing was present along with bearing failure at the support ends of the large trusses. Again, full access to the roof framing was not permitted due to the unstable and dangerous conditions. Structural steel beams with steel columns had been added underneath the roof framing and second floor framing at some point for either additional support or for some type of floor plan modification that removed interior loadbearing walls. Some of those structural steel elements were also in a process of ongoing collapse due to them being placed on portions of original wood framing, which subsequently deteriorated.

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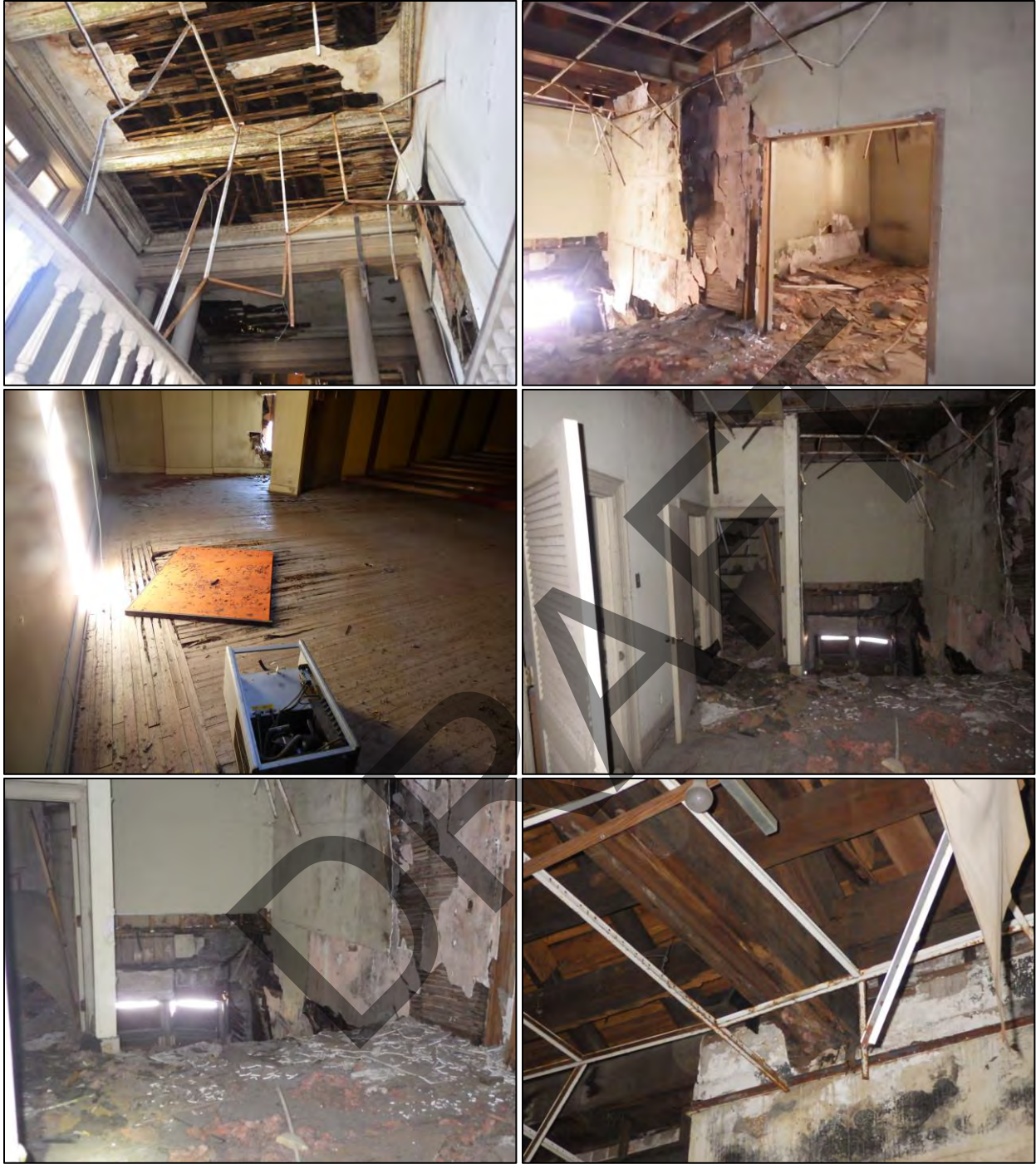
Figures 18 – 23

Typical first floor interior conditions.



Figures 24 – 27

Figure 24: Open assembly room at second floor looking in a southeastern direction (toward the front from the back). The two rows of square tube steel columns are not original. Figure 25: Same room, looking due southward. Note the partial collapse of the interior wall and door frame. Figures 26 and 27: Examples of heavy deterioration to wall and floor areas with partial collapse conditions of floors.



Figures 28 – 33

Figure 28: Underside of third floor framing as seen from the front (south) lobby entry.

Figures 29 – 32: Various conditions of third floor space with full collapse of floors, partial collapse of others, and heavy water damage and deterioration. Figure 33: Example of deteriorated wood truss girder at roof framing.

CONCLUSIONS:

The Elk's Lodge Building is structurally unstable and in very poor condition.

Large areas of the wood floor and roof framing have collapsed and are damaged beyond repair. The added structural steel components (beams and columns) are also in a state of ongoing collapse. The perimeter exterior walls contain severe vertical and lateral movement due to the degradation of the original reinforced concrete bond beams, the deterioration of mortar, prolonged water infiltration, heavy plant growth, and years of neglect. The outside walls are unstable and have begun to collapse.

Repairing and renovating this building would be a very difficult and ambitious project. The first step would require stabilizing the outside walls, even prior to interior demolition. This would necessitate the installation of large, but temporary structural steel frames along the outside face on all four sides. The temporary frames would be connected to the existing walls to "hold them in place" so that they could then be repaired one section at a time. This repair would have to be coordinated with interior demolition so that workers could access both sides of the exterior walls. The wall repairs would vary, depending on location, and could range from complete replacement of the original reinforced bond beams at each floor level along with removing and reconstructing the wall sections above and below window openings as well as removing and reconstructing the upper sections where the walls transition from split face block to multi-wythe brick. Most, if not all of the interior, floor beams, trusses, remnants of wood framing, etc., would be completely removed along with all of the collapsed debris. Foundation stabilization around the perimeter and some of the interior would also be needed. A new interior superstructure would likely be needed to carry the new floors and roof, which would require additional foundation work for new footings. Then would come the construction of new floor and roof framing, windows, interior finishes, an elevator, mechanical, electrical, and plumbing systems, and a proper exterior envelope system. At some point along the course of new construction, the exterior wall brace frames would need to be removed.

The project would be dangerous due to the existing instability that is so prevalent. The exterior walls have reached a point of structural damage that would make the project unrealistic, mainly due to the safety concerns for workers. A real threat of wall collapse exists and would be present during the course of work.

RECOMMENDATIONS:

Given the unstable and dangerous conditions of the entire building, recommendations would be to demolish the old Elk's Lodge rather than attempt any renovations. Until demolition can be accomplished, the area around the building should be barricaded to protect the public.

The demolition aspect would be best served with professional engineering or architecture services since the project would likely need contract documents for proper bidding as well as specifications for proper asbestos abatement and disposal. There would also be an opportunity to salvage some historic elements and materials if desired.

LIMITATIONS:

This visual structural evaluation has been conducted according to standard professional practice. The visual examination and report are limited to those areas readily visible during the site visit. Further study would be required to determine and evaluate any other hidden defects or deficiencies not mentioned, which might be present. We warrant that the findings, recommendations, and professional advice contained herein have been made after being prepared in accordance with generally accepted professional engineering practice in the field of structural engineering. In no way does this report state any guarantees regarding future structural or foundation movement, mold/mildew growth, or latent conditions. This report should be viewed only as an assessment of the current conditions discovered during the stated site visits. No other warranties are implied or expressed. This structural evaluation letter does not create any right or benefits for parties other than W. Mark Watson, PE, LLC and The City of Greenville. Parties other than the aforementioned should contact the structural engineer's office with questions and/or additional requests. Should conditions contrary to those stated be encountered or expected, we respectfully request an opportunity to re-evaluate our recommendations based on such information.

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Appendix C

Prior Reports

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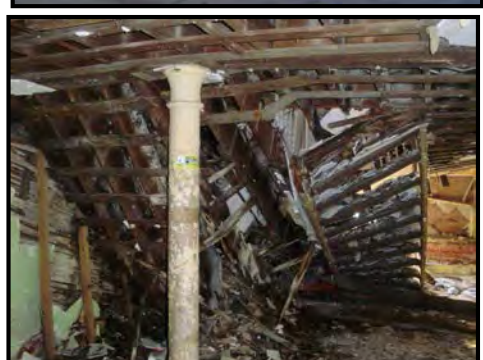
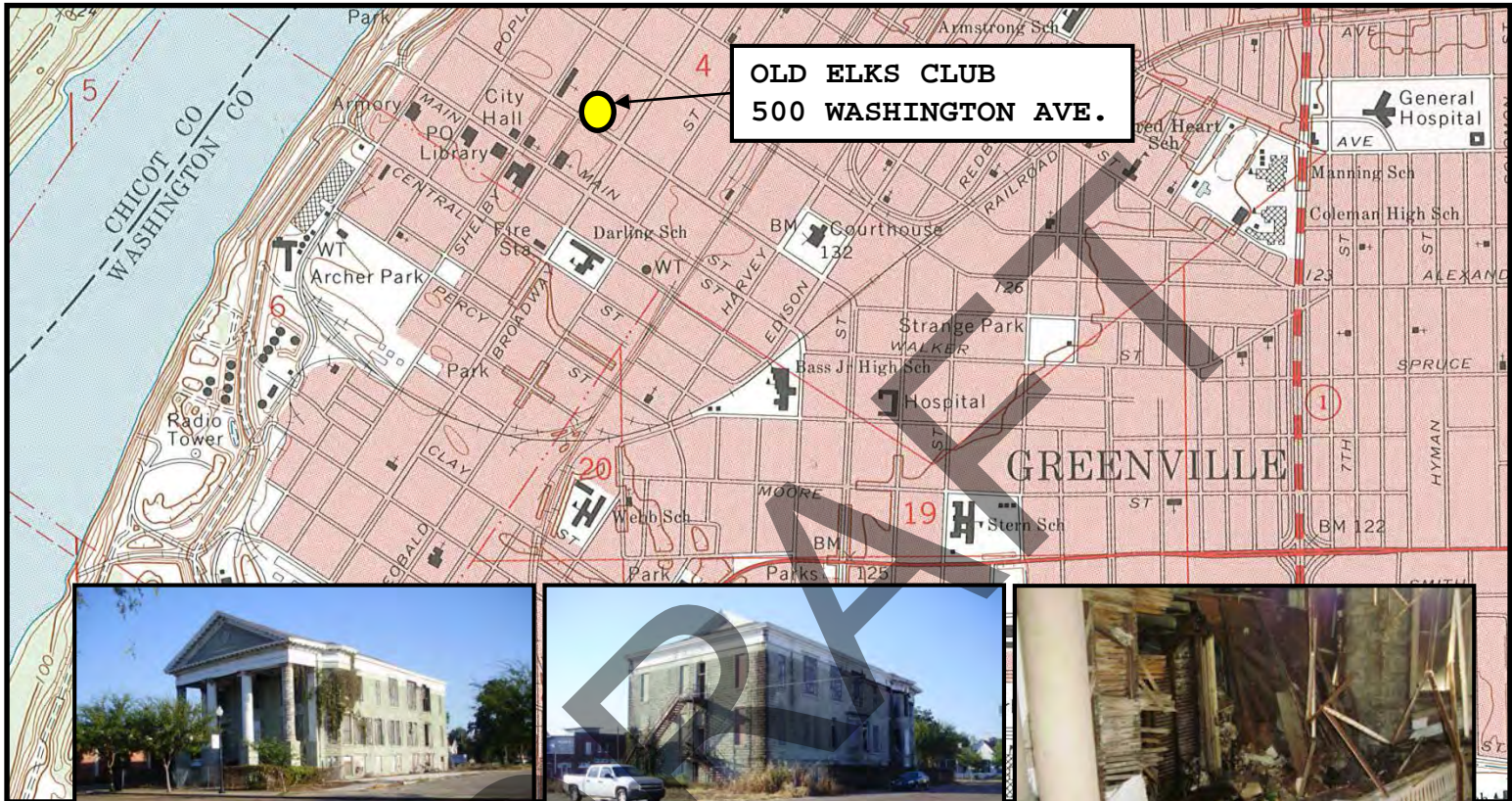
Appendix C1

**Excerpts from Cardno's November 2018
Asbestos and Lead-Based Paint Surveys**

DRAFT

Lead Paint Survey of Old Elks Club

500 Washington Ave.
Greenville, MS



Submitted to:

Mr. William L. Burle, Jr.

W.L. Burle, Engineers, P.A

111 South Walnut Street

Greenville, MS 38701

October 5, 2018

Lead Paint Inspection Performed by:

Vance Nimrod, P.E.

323 Central Street

Greenville, MS 38701

(662)820-9612

Email: vance.nimrod@gmail.com

Prepared for the City of Greenville, MS

Conducted under the EPA Brownfields

Cooperative Agreement No. BF-00D60317

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APPENDICES:

Appendix A: Lead Paint Sampling Locations
Appendix B: Laboratory Lead Paint Report
Appendix C: Professional Credentials

1.0 PURPOSE AND SCOPE OF SERVICES

Vance Nimrod, P.E., (VN) was retained by W.L. Burle, Engineers, P.A. on behalf of the City of Greenville, MS, to conduct a survey to identify any lead paint in or on the Old Elks Club at 500 Washington Avenue, Greenville, MS. The survey was performed under and funded by the City of Greenville through their 2017 Environmental Protection Agency (EPA) Assessment Grant.

VN conducted the lead paint survey in accordance with the approved scope of work listed below:

1. **Interview with Knowledgeable Person(s)** - VN attempted to meet with person or persons who are familiar with past construction and renovation activities of the facility planned for demolition.
2. **Preliminary Walk-Through** - VN conducted a preliminary walk-through of the facility to locate any suspect lead paint.
3. **Sampling Program** - VN developed a sampling program for the facility. The lead paint sampling will be performed by VN, a Mississippi Certified Asbestos Inspector, under the EPA and Mississippi Department of Environmental Quality (MDEQ) approved Generic Quality Assurance Project Plan (QAPP) dated January 5, 2018.
4. **Report** - VN prepared a report which documents the work performed, references the test results, and tabulates any lead paint containing materials encountered on-site.

2.0 REGULATORY BACKGROUND

Lead based paint was used widely in structures until 1978, when its use was prohibited by Federal law. The lead can cause adverse health effects if it is ingested into the body. It can be ingested by mouth and by breathing lead contaminated air. The Federal Lead Standard defines lead based paint as greater than 0.5% lead by weight from paint chip sampling. Paint with a lead concentration of less than 0.5% lead is not considered to be lead based paint.

3.0 SITE DESCRIPTION

The project site is a three-story masonry block building that is framed primarily with wood and has a pitched roof. There is a facade of decorative masonry blocks on the exterior walls. It is approximately 50 feet wide and 90 feet deep. The total floor space is approximately 13,500 square feet. The roof is extended approximately 12 feet south to protect the entrance from the elements. The extended roof is supported by four large pillars. See sketches of each floor in Appendix A.

The building is in poor condition primarily from roof leaks from the old roof that was replaced in approximately year 2000. The building is also in poor condition from roof leaks from the new roof. Multi stairways at the front of the building have collapsed. Most of the other water damage is along the interior sides of the building.

A terrazzo floor covers almost the entire first floor. One room on the eastside, labeled Room D, has floor tile on the terrazzo. The second and third floors have a wood base. The second floor is mostly covered with floor tile with some ceramic tile in the south foyer. There is a limited amount of floor tile on the third floor south of the theater.

4.0 SITE SURVEY PROTOCOL

Mr. Vance Nimrod, P.E. (Inspection ID No. PBI-00001068) performed on-site lead paint survey activities on September 6 and 9, 2018. The sampling protocol utilized followed industry standards and consisted of 1) identifying suspect lead based paint, 2) evaluating homogenous areas, and 3) sampling suspect lead based paint. Homogenous sampling areas are defined as areas in which the materials are uniform in appearance, such as color and texture, and were installed during the same period.

VN has established a standard lead paint survey report form which allows the collection of assessment data in the field. The suspect lead based paint is classified by site location, material type, accessibility, and physical condition. The survey and sampling program was limited to visible and accessible materials and did not include inaccessible areas. The sampling locations are referenced in Appendix A.

The following suspect lead based paint coatings were identified and sampled:

1. Paint on interior walls.
2. Paint on ceilings.
3. Paint on wood trim.
4. Paint on ceiling tin.
5. Paint on steel columns.
6. Paint on interior bricks.
7. Paint on exterior doors and frames.
8. Paint on exterior walls and decorative blocks.

A total of 45 samples of suspect lead based paint were collected. The samples were submitted to EMSL Analytical, Inc., of Baton Rouge, LA.

5.0 ANALYTICAL PROTOCOL

Analysis following lead in paint by EMSL SOP/Determination of Environmental Lead by FLAA. All coatings determined to have 0.5% or greater lead by weight were classified as lead based paint samples analyzed by EMSL Analytical, Inc. of

6.0 SAMPLING RESULTS

A review of the laboratory results revealed the following:

6.1. Lead paint suspect samples that were found to contain greater than 0.5% lead are identified below:

6.1.1 Interior Samples

- 1. Orange paint on wood trim on east wall of 1st floor hallway tested 4.5% lead.**
- 2. White paint on ceiling tin on 1st floor hallway tested 1.5% lead.**
- 3. White paint on ceiling tin of Room C 2nd layer tested 6.8% lead.**
- 4. Orange paint on trim at north end of 1st floor hallway tested 1.4% lead.**
- 5. White paint on ceiling tin at north end of 1st floor hallway tested 9.2% lead.**
- 6. Green paint on 1st floor back wall tested 23% lead.**
- 7. Yellow paint on 2nd floor bathroom east wall tested 8.2% lead.**
- 8. Orange paint on 3rd floor north wall of south hall tested 17% lead.**

6.1.2 Exterior Samples

- 1. White paint on exterior door wood from 2nd floor south end tested 0.72% lead.**
- 2. White paint on exterior door frame from 2nd floor south end tested 1.6% lead.**

Appendix B shows the laboratory results for each sample found to test more than 0.5% lead.

6.2. Lead paint samples that tested less than 0.5% lead are as follows:

6.2.1 Interior Samples

29 interior samples taken not included in 6.1.1 above tested less than 0.5% lead.

6.2.2 Exterior Samples

Six (6) exterior samples taken not included in 6.1.2 above, tested less than 0.5% lead.

Appendix B shows the laboratory results for each sample found to test less than 0.5% lead.

- 6.3 Appendix B also includes additional work on the lead paint samples that contained more than 0.5% lead. These pages are color-coded. The 10 samples are first listed by sample number, location and an approximate quantity of lead based paint on the site.

The locations of the actual samples taken are shown in color on the 1st, 2nd and 3rd floor layouts that follow.

7.0 LIMITATIONS AND RECOMMENDATIONS

7.1 Limitations

7.1.1 Most of the paint in the building is peeling. Some of the peeling paint is still hanging on the walls and ceiling. Some of the peeling paint has fallen to the floor and is lost. Most of the paint is gone from the tin ceilings and is lost.

7.1.2 There is an apparent sheet metal band just under the roof eaves on the building's west side and east side. The band is approximately 5 feet in depth and is directly above the exterior decorative block walls. Paint is peeling in several areas on this band. Due to the lack of an operating City lift, this paint was not sampled.

7.2. Recommendations

The following recommendations are made concerning the lead based paint samples located on and in the building:

7.2.1 It is recommended that this lead based paint inspection report be discussed with and provided to the building contractors.

8.0 QUALIFYING STATEMENT

VN presents the findings, conclusions, and recommendations herein, which are based solely on the conditions observed during the inspection of the facility conducted on September 6 and 9, 2018. Additionally, VN does not make any representation or projection as to past conditions or future exposures and does not extend its findings to areas outside of the statistical representation of the completed investigation.

The findings and conclusions of this report are not scientific certainties, but rather, probabilities based on professional judgment concerning the significance of the data gathered during the course of the site investigation. This report has been prepared for the exclusive use by W.L. Burle, Engineers, P.A. and its associated firms and

entities. This report and its analytical results, findings, conclusions, and recommendations either in part or in its entirety are not to be used by any other party without prior consent by W.L. Burle, Engineers, P.A.

9.0 SIGNATURE OF LEAD BASED PAINT INSPECTOR



Vance Nimrod, P.E.
Mississippi Certified Asbestos Inspector
Certificate No.: ABI-00001505
October 5, 2018

10.0 QUALIFICATIONS OF LEAD PAINT INSPECTOR

See APPENDIX C.

- End of Report -

DRAFT

Appendix A

Lead Paint Sampling Locations

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Lead Paint Survey

Vance Nimrod, 9/6/18

Sample Locations

Sample	No.	Color	Location	Comments
--------	-----	-------	----------	----------

1st Floor

EL	101	Yellow on Plaster	Front Hall, South Wall	Peeling Paint
EL	102	Yellow on Plaster	Front Hall, North Wall	Peeling Paint
EL	103	White on Sheet Rock	Front Hall, East Wall	Peeling Paint
EL	104	Yellow on Plaster	Hallway East Wall	Peeling Paint
EL	105	Orange on Wood Trim	Hallway East Wall	Peeling Paint
EL	106	White on Ceiling Tin	Hallway Ceiling	Peeling Paint
EL	107	White on Plaster	Room C, Wall	Peeling Paint
EL	108	White on Tin, Top Layer	Room C, Ceiling	Peeling Paint
EL	109	White on Tin, 2nd Layer	Room C, Ceiling	Peeling Paint
EL	110	White on Air Duct	Room C	Peeling Paint
EL	111	Yellow on Plaster	North Hallway, Wall	Peeling Paint
EL	112	Orange on Trim	North Hallway, Wall	Peeling Paint
EL	113	White on Sh Rock on Tin	North Hallway,, Ceiling	Peeling Paint
EL	114	White on Tin	North Hallway,, Ceiling	Peeling Paint
EL	115	Green on Plaster	Back Entrance Wall	Peeling Paint

2nd Floor

EL	116	White on Sh Rock	South Hall Wall	Peeling Paint
EL	117	Tan on Sh Rock	South Hall Wall	Peeling Paint
EL	118	Pink on Wood Post	South Hall Wall	Peeling Paint
EL	119	White on Plaster	South Hall Ceiling	Peeling Paint
EL	120	White on Plaster	Ballroom, South Wall	Peeling Paint
EL	121	White on Plaster	Ballroom, Wes Wall	Peeling Paint
EL	122	White on Sh Rock	Ballroom, North Wall	Peeling Paint
EL	123	White on Sh Rock, Top Layer	Ballroom, East Wall	Peeling Paint
EL	124	Yellow on Plaster, 2nd layer	Ballroom, East Wall	Peeling Paint
EL	125	White on Steel Column	Ballroom	Peeling Paint
EL	126	White on Sh Rock	Bar, North Wall	Peeling Paint
EL	127	White on Sh Rock	Bar, Center Wall	Peeling Paint
EL	128	White on Sh Rock	NW RR Wall	Peeling Paint

3rd Floor

EL	129	Green on Sh Rock	South Hall, North Wall	Peeling Paint
EL	130	Green on Sh Rock	South Hall, East Wall	Peeling Paint
EL	131	Orange on Plaster	South Hall, North Wall	Peeling Paint
EL	132	White on Sh Rock	Area Behind Projection, Wall	Peeling Paint
EL	133	Pink on Plaster	Area Behind Projection, Wall	Peeling Paint
EL	134	White on Brick	Room West of Projection	Peeling Paint
EL	135	White on Sh Rock	Theater, West Wall	Peeling Paint
EL	136	White on Sh Rock	Theater, North Wall	Peeling Paint
EL	137	White on Sh Rock	North Wall of Bldg	Peeling Paint

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Lead Paint Survey

Vance Nimrod, 9/10/18

Sample Locations

Sample	No.	Color	Location	Comments
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Exterior

EL	138	White on Wood	Front Door, South, 1st Floor	Peeling
El	139	White on Wood	Frt Door Frame, South, 1st Floor	Peeling
El	140	White on Wood	Front Door, South, 2nd Floor	Peeling
El	141	White on Wood	Frt Door Frame, South, 2nd Floor	Peeling
El	142	Green on Masonry	Wall, South Side	Fair Condition
El	143	Green on Masonry Blocks	Wall, West Side	Fair Condition
El	144	Green on Masonry Blocks	Wall, North Side	Fair Condition
El	145	Green on Masonry Blocks	Wall, East Side	Fair Condition

DRAFT

Appendix B
Laboratory Lead Paint Report

**EMSL Analytical, Inc.**

18369 Petroleum Drive, Baton Rouge, LA 70809

Phone/Fax: (225) 755-1920 / (225) 755-1989

<http://www.EMSL.com>batonrougelab@emsl.com

EMSL Order: 251805471

CustomerID: VNMS42

CustomerPO:

ProjectID:

Attn: **Vance Nimrod**
Vance Nimrod
323 Central Street
Greenville, MS 38701

Phone: (662) 820-9612
Fax:
Received: 09/12/18 10:25 AM
Collected: 9/6/2018

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client Sample Description	Lab ID	Collected	Analyzed	Lead Concentration
EL101** Site: 1st Floor Front Hall South Wall	251805471-0001	9/6/2018	9/19/2018	0.037 % wt
EL102 Site: 1st Floor Front Hall North Wall	251805471-0002	9/6/2018	9/19/2018	0.093 % wt
EL103 Site: 1st Floor Front Hall East Wall	251805471-0003	9/6/2018	9/19/2018	<0.010 % wt
EL104** Site: 1st Floor Hallway East Wall	251805471-0004	9/6/2018	9/19/2018	<0.059 % wt
EL105 Site: 1st Floor Hallway East Wall	251805471-0005	9/6/2018	9/19/2018	4.5 % wt
EL106 Site: 1st Floor Hallway Ceiling	251805471-0006	9/6/2018	9/19/2018	1.8 % wt
EL107 Site: 1st Floor Room C Wall	251805471-0007	9/6/2018	9/19/2018	0.018 % wt
EL108 Site: 1st Floor Room C Ceiling	251805471-0008	9/6/2018	9/19/2018	0.22 % wt
EL109 Site: 1st Floor Room C Ceiling	251805471-0009	9/6/2018	9/19/2018	6.8 % wt
EL110 Site: 1st Floor Room C	251805471-0010	9/6/2018	9/19/2018	0.26 % wt
EL111** Site: 1st Floor North Hallway Wall	251805471-0011	9/6/2018	9/19/2018	0.098 % wt
EL112 Site: 1st Floor North Hallway Wall	251805471-0012	9/6/2018	9/19/2018	1.4 % wt
EL113 Site: 1st Floor North Hallway Ceiling	251805471-0013	9/6/2018	9/19/2018	0.19 % wt
EL114 Site: 1st Floor North Hallway Ceiling	251805471-0014	9/6/2018	9/19/2018	9.2 % wt
EL115** Site: 1st Floor Back Entrance Wall	251805471-0015	9/6/2018	9/19/2018	23 % wt
EL116 Site: 2nd Floor South Hall Wall	251805471-0016	9/6/2018	9/19/2018	0.21 % wt

Jamie Laginess, Laboratory Operations Manager
or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements unless specifically indicated otherwise. Definitions of modifications are available upon request.

Samples analyzed by EMSL Analytical, Inc. Baton Rouge, LA LELAP 01950; A2LA Accredited Environmental Testing Cert. #2845.03.

Initial report from 09/19/2018 17:25:33

**EMSL Analytical, Inc.**

18369 Petroleum Drive, Baton Rouge, LA 70809

Phone/Fax: (225) 755-1920 / (225) 755-1989

<http://www.EMSL.com>batonrougelab@emsl.com

EMSL Order: 251805471

CustomerID: VNMS42

CustomerPO:

ProjectID:

Attn: **Vance Nimrod**
Vance Nimrod
323 Central Street
Greenville, MS 38701

Phone: (662) 820-9612
Fax:
Received: 09/12/18 10:25 AM
Collected: 9/6/2018

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client Sample Description	Lab ID	Collected	Analyzed	Lead Concentration
EL117	251805471-0017	9/6/2018	9/19/2018	0.25 % wt
Site: 2nd Floor South Hall Wall				
EL118	251805471-0018	9/6/2018	9/19/2018	0.046 % wt
Site: 2nd Floor South Hall Wall				
EL119	251805471-0019	9/6/2018	9/19/2018	0.013 % wt
Site: 2nd Floor South Hall Ceiling				
EL120	251805471-0020	9/6/2018	9/19/2018	0.078 % wt
Site: 2nd Floor Ballroom South Wall				
EL121	251805471-0021	9/6/2018	9/19/2018	0.10 % wt
Site: 2nd Floor Ballroom West Wall				
EL122	251805471-0022	9/6/2018	9/19/2018	0.22 % wt
Site: 2nd Floor Ballroom North Wall				
EL123	251805471-0023	9/6/2018	9/19/2018	0.11 % wt
Site: 2nd Floor Ballroom East Wall				
EL124	251805471-0024	9/6/2018	9/19/2018	8.2 % wt
Site: 2nd Floor Ballroom East Wall				
EL125	251805471-0025	9/6/2018	9/19/2018	0.45 % wt
Site: 2nd Floor Ballroom				
EL126	251805471-0026	9/6/2018	9/19/2018	0.074 % wt
Site: 2nd Floor Bar North Wall				
EL127	251805471-0027	9/6/2018	9/19/2018	0.18 % wt
Site: 2nd Floor Bar Center Wall				
EL128	251805471-0028	9/6/2018	9/19/2018	0.16 % wt
Site: 2nd Floor NW RR Wall				
EL129	251805471-0029	9/6/2018	9/19/2018	0.079 % wt
Site: 3rd Floor South Hall North Wall				
EL130	251805471-0030	9/6/2018	9/19/2018	<0.010 % wt
Site: 3rd Floor South Hall East Wall				
EL131	251805471-0031	9/6/2018	9/19/2018	17 % wt
Site: 3rd Floor South Hall North Wall				
EL132	251805471-0032	9/6/2018	9/19/2018	0.16 % wt
Site: 3rd Floor Behind Projection Wall				

Jamie Laginess, Laboratory Operations Manager
or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements unless specifically indicated otherwise. Definitions of modifications are available upon request.

Samples analyzed by EMSL Analytical, Inc. Baton Rouge, LA LELAP 01950; A2LA Accredited Environmental Testing Cert. #2845.03.

Initial report from 09/19/2018 17:25:33

**EMSL Analytical, Inc.**

18369 Petroleum Drive, Baton Rouge, LA 70809

Phone/Fax: (225) 755-1920 / (225) 755-1989

<http://www.EMSL.com>batonrougelab@emsl.com

EMSL Order: 251805471
CustomerID: VNMS42
CustomerPO:
ProjectID:

Attn: **Vance Nimrod**
Vance Nimrod
323 Central Street
Greenville, MS 38701

Phone: (662) 820-9612
Fax:
Received: 09/12/18 10:25 AM
Collected: 9/6/2018

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client Sample Description	Lab ID	Collected	Analyzed	Lead Concentration
EL133	251805471-0033	9/6/2018	9/19/2018	0.012 % wt
Site: 3rd Floor Behind Projection Wall				
EL134	251805471-0034	9/6/2018	9/19/2018	0.042 % wt
Site: 3rd Floor Room West of Projection				
EL135	251805471-0035	9/6/2018	9/19/2018	0.26 % wt
Site: 3rd Floor Theater West Wall				
EL136	251805471-0036	9/6/2018	9/19/2018	<0.010 % wt
Site: 3rd Floor Theater North Wall				
EL137	251805471-0037	9/6/2018	9/19/2018	<0.010 % wt
Site: 3rd Floor North Wall of Bldg				
EL138	251805471-0038	9/6/2018	9/19/2018	<0.010 % wt
Site: Front Door South 1st Floor				
EL139	251805471-0039	9/6/2018	9/19/2018	<0.010 % wt
Site: Frt Door Frame South 1st Floor				
EL140	251805471-0040	9/6/2018	9/19/2018	0.72 % wt
Site: Front Door South 2nd Floor				
EL141	251805471-0041	9/6/2018	9/19/2018	1.6 % wt
Site: Frt Door Frame South 2nd Floor				
EL142	251805471-0042	9/6/2018	9/19/2018	0.015 % wt
Site: Wall South Side				
EL143	251805471-0043	9/6/2018	9/19/2018	0.019 % wt
Site: Wall West Side				
EL144	251805471-0044	9/6/2018	9/19/2018	0.035 % wt
Site: Wall North Side				
EL145	251805471-0045	9/6/2018	9/19/2018	0.019 % wt
Site: Wall East Side				

** Data reported may not reach applicable analytical sensitivity due to insufficient sample weight submitted.
Suggested weight for analysis is 0.2g.

Jamie Laginess, Laboratory Operations Manager
or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements unless specifically indicated otherwise. Definitions of modifications are available upon request.

Samples analyzed by EMSL Analytical, Inc. Baton Rouge, LA LELAP 01950; A2LA Accredited Environmental Testing Cert. #2845.03.

Initial report from 09/19/2018 17:25:33

EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS TRAINING

Lead (Pb) Chain of Custody

EMSL Order ID (Lab Use Only):

5471

EMSL ANALYTICAL, INC.
18369 PETROLEUM DRIVE
BATON ROUGE, LA 70809
PHONE: 225-755-1920

Company: <u>VANCE NIMROD</u>		EMSL-Bill to: <input type="checkbox"/> Same <input type="checkbox"/> Different If Bill to is Different note instructions in Comments**		
Street: <u>323 CENTRAL STREET</u>		Third Party Billing requires written authorization from third party		
City: <u>GREENVILLE</u>	State/Province: <u>MS</u>	Zip/Postal Code: <u>38701</u>	Country: <u>USA</u>	
Report To (Name): <u>Vance Nimrod</u>		Fax #:		
Telephone #:		Email Address: <u>VANCE.NIMROD@GMAIL.COM</u>		
Project Name/Number:				
Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email		Purchase Order:	U.S. State Samples Taken: <u>45</u>	
Turnaround Time (TAT) Options* - Please Check				
<input type="checkbox"/> 3 Hour	<input type="checkbox"/> 6 Hour	<input type="checkbox"/> 24 Hour	<input type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input checked="" type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week	
*Analysis completed in accordance with EMSL's Terms and Conditions located in the Price Guide				
Matrix	Method	Instrument	Reporting Limit	Check
Chips <input type="checkbox"/> mg/cm ² <input checked="" type="checkbox"/> % by wt.	SW846-7000B/7420 or AOAC 974.02	Flame Atomic Absorption	0.01%	<input type="checkbox"/>
Air	NIOSH 7082	Flame Atomic Absorption	4 µg/filter	<input type="checkbox"/>
	NIOSH 7105	Graphite Furnace AA	0.03 µg/filter	<input type="checkbox"/>
	NIOSH 7300 modified	ICP-AES	0.5 µg/filter	<input type="checkbox"/>
Wipe* <input type="checkbox"/> ASTM <input type="checkbox"/> non ASTM *if no box is checked, non-ASTM Wipe is assumed	SW846-7000B/7420	Flame Atomic Absorption	10 µg/wipe	<input type="checkbox"/>
	SW846-6010B or C	ICP-AES	0.5 µg/wipe	<input type="checkbox"/>
TCLP	SW846-1311/7420/SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	SW846-6010B or C	ICP-AES	0.1 mg/L (ppm)	<input type="checkbox"/>
Soil	SW846-7000B/7420	Flame Atomic Absorption	40 mg/kg (ppm)	<input type="checkbox"/>
	SW846-7421	Graphite Furnace AA	0.3 mg/kg (ppm)	<input type="checkbox"/>
	SW846-6010B or C	ICP-AES	1 mg/kg (ppm)	<input type="checkbox"/>
Wastewater	SM3111B or SW846-7000B/7420	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	<input type="checkbox"/>
	SW846-6010B or C	ICP-AES	1 mg/kg (ppm)	<input type="checkbox"/>
Drinking Water	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	<input type="checkbox"/>
Other:		Preservation Method (Water):		
Name of Sampler: <u>VANCE NIMROD</u>		Signature of Sampler: <u>[Signature]</u>		
Sample #	Location	Volume/Area	Date/Time Sampled	
	SEE ATTACHED LIST OF 45 SAMPLES IN 1 BAG			
	EL 101 TO EL 145			
Client Sample #'s		Total # of Samples: <u>45</u>		
Relinquished (Client): <u>[Signature]</u>	Date: <u>9/11/18</u>	Time: <u>1600</u>		
Received (Lab): <u>[Signature]</u>	Date: <u>9/12/18</u>	Time: <u>10:25 am</u>		
Comments:				

(E) 1955 6352 3697
1 of 2

5471

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Lead Paint Survey

Vance Nimrod, 9/6/18

Sample Locations

Sample	No.	Color	Location	Comments
1st Floor				
EL	101	Yellow on Plaster	Front Hall, South Wall	Peeling Paint
EL	102	Yellow on Plaster	Front Hall, North Wall	Peeling Paint
EL	103	White on Sheet Rock	Front Hall, East Wall	Peeling Paint
EL	104	Yellow on Plaster	Hallway East Wall	Peeling Paint
EL	105	Orange on Wood Trim	Hallway East Wall	Peeling Paint
EL	106	White on Ceiling Tin	Hallway Ceiling	Peeling Paint
EL	107	White on Plaster	Room C, Wall	Peeling Paint
EL	108	White on Tin, Top Layer	Room C, Ceiling	Peeling Paint
EL	109	White on Tin, 2nd Layer	Room C, Ceiling	Peeling Paint
EL	110	White on Air Duct	Room C	Peeling Paint
EL	111	Yellow on Plaster	North Hallway, Wall	Peeling Paint
EL	112	Orange on Trim	North Hallway, Wall	Peeling Paint
EL	113	White on Sh Rock on Tin	North Hallway,, Ceiling	Peeling Paint
EL	114	White on Tin	North Hallway,, Ceiling	Peeling Paint
EL	115	Green on Plaster	Back Entrance Wall	Peeling Paint
2nd Floor				
EL	116	White on Sh Rock	South Hall Wall	Peeling Paint
EL	117	Tan on Sh Rock	South Hall Wall	Peeling Paint
EL	118	Pink on Wood Post	South Hall Wall	Peeling Paint
EL	119	White on Plaster	South Hall Ceiling	Peeling Paint
EL	120	White on Plaster	Ballroom, South Wall	Peeling Paint
EL	121	White on Plaster	Ballroom, Wes Wall	Peeling Paint
EL	122	White on Sh Rock	Ballroom, North Wall	Peeling Paint
EL	123	White on Sh Rock, Top Layer	Ballroom, East Wall	Peeling Paint
EL	124	Yellow on Plaster, 2nd layer	Ballroom, East Wall	Peeling Paint
EL	125	White on Steel Column	Ballroom	Peeling Paint
EL	126	White on Sh Rock	Bar, North Wall	Peeling Paint
EL	127	White on Sh Rock	Bar, Center Wall	Peeling Paint
EL	128	White on Sh Rock	NW RR Wall	Peeling Paint
3rd Floor				
EL	129	Green on Sh Rock	South Hall, North Wall	Peeling Paint
EL	130	Green on Sh Rock	South Hall, East Wall	Peeling Paint
EL	131	Orange on Plaster	South Hall, North Wall	Peeling Paint
EL	132	White on Sh Rock	Area Behind Projection, Wall	Peeling Paint
EL	133	Pink on Plaster	Area Behind Projection, Wall	Peeling Paint
EL	134	White on Brick	Room West of Projection	Peeling Paint
EL	135	White on Sh Rock	Theater, West Wall	Peeling Paint
EL	136	White on Sh Rock	Theater, North Wall	Peeling Paint
EL	137	White on Sh Rock	North Wall of Bldg	Peeling Paint

5471

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Lead Paint Survey

Vance Nimrod, 9/10/18

Sample Locations

Sample	No.	Color	Location	Comments
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Exterior

EL	138	White on Wood	Front Door, South, 1st Floor	Peeling
El	139	White on Wood	Frt Door Frame, South, 1st Floor	Peeling
El	140	White on Wood	Front Door, South, 2nd Floor	Peeling
El	141	White on Wood	Frt Door Frame, South, 2nd Floor	Peeling
El	142	Green on Masonry	Wall, South Side	Fair Condition
El	143	Green on Masonry Blocks	Wall, West Side	Fair Condition
El	144	Green on Masonry Blocks	Wall, North Side	Fair Condition
El	145	Green on Masonry Blocks	Wall, East Side	Fair Condition

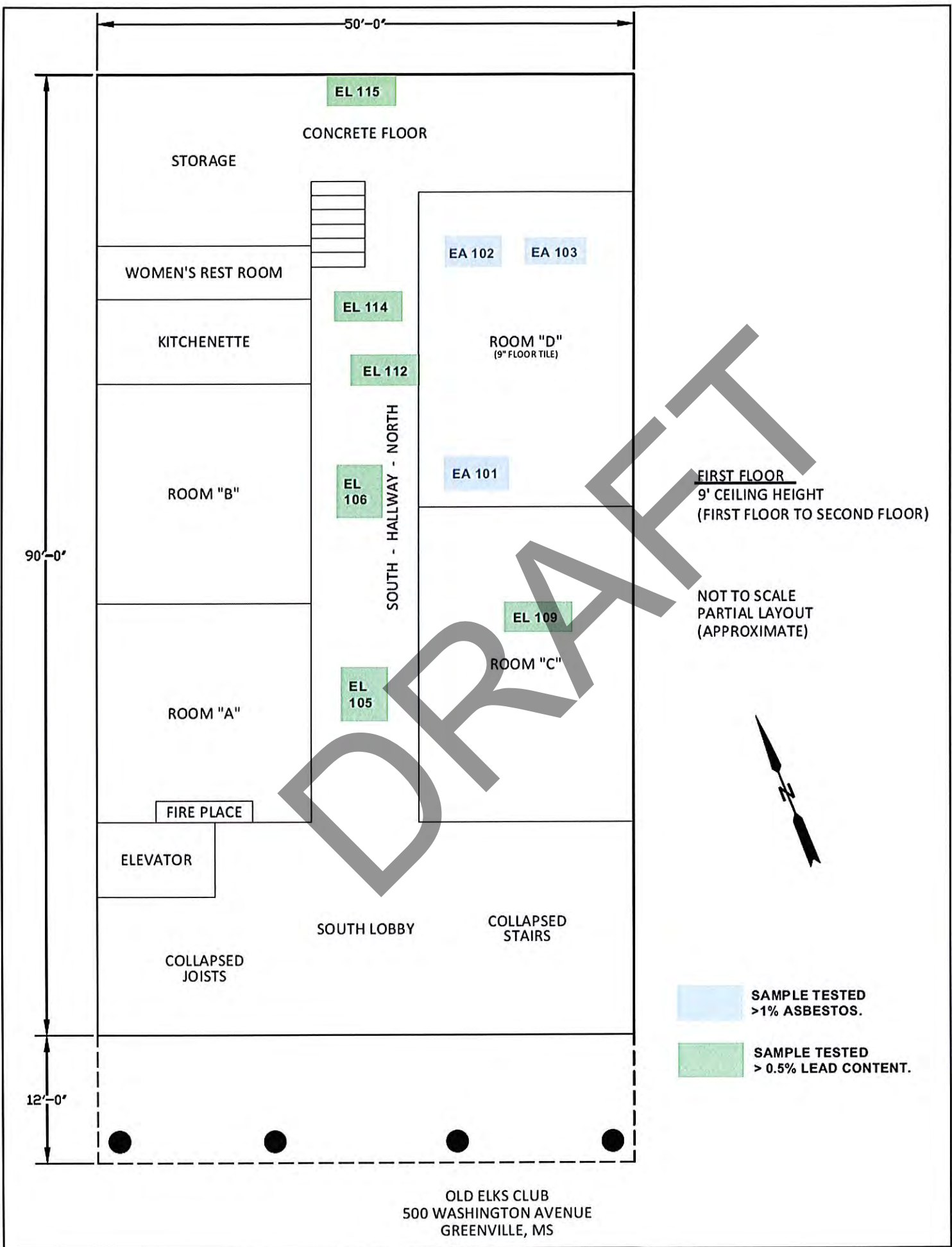
DRAFT

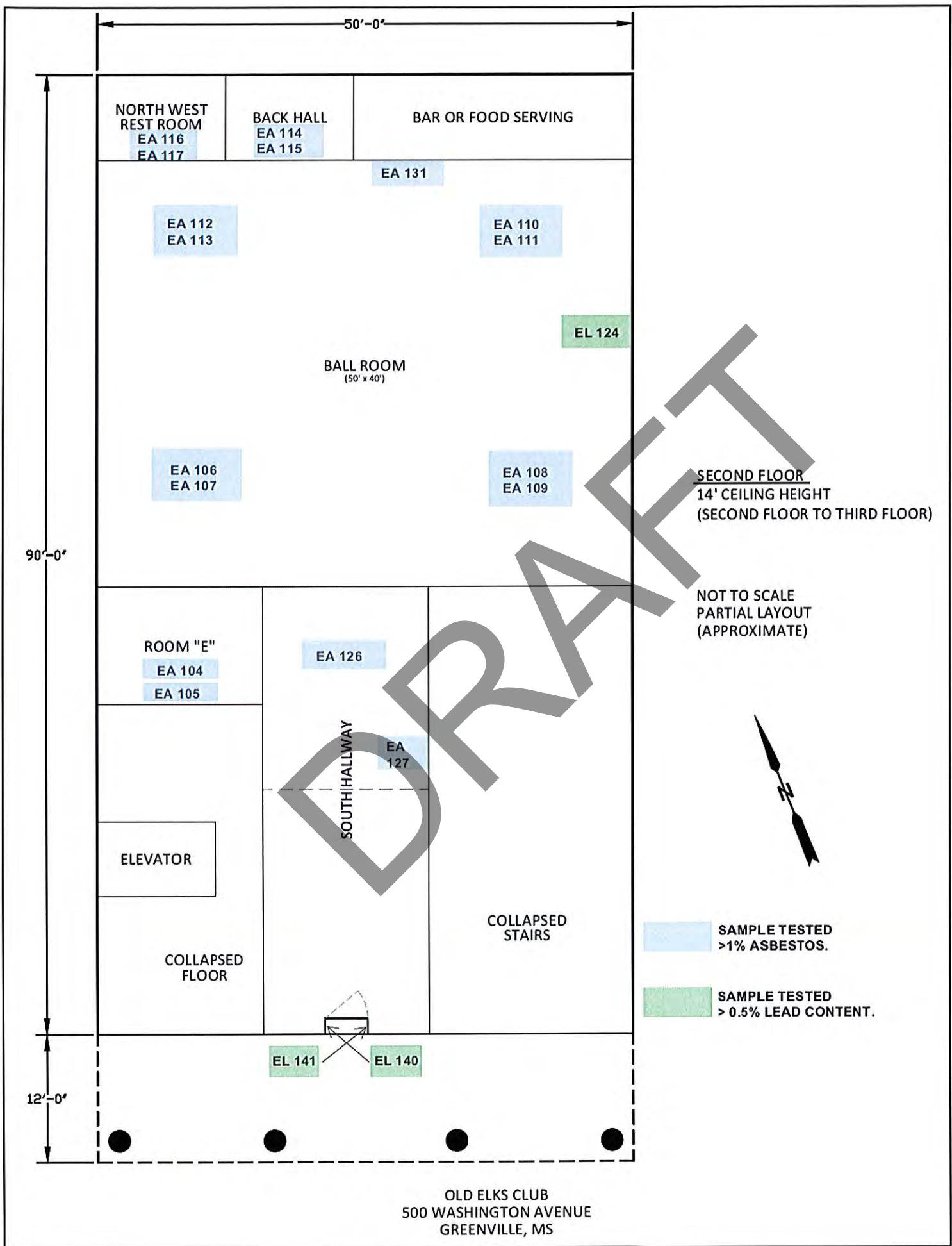
**SAMPLE NUMBERS OF PAINT WITH A LEAD CONTENT GREATER THAN 0.5% AND
APPROXIMATE QUANTITIES OF MATERIAL**

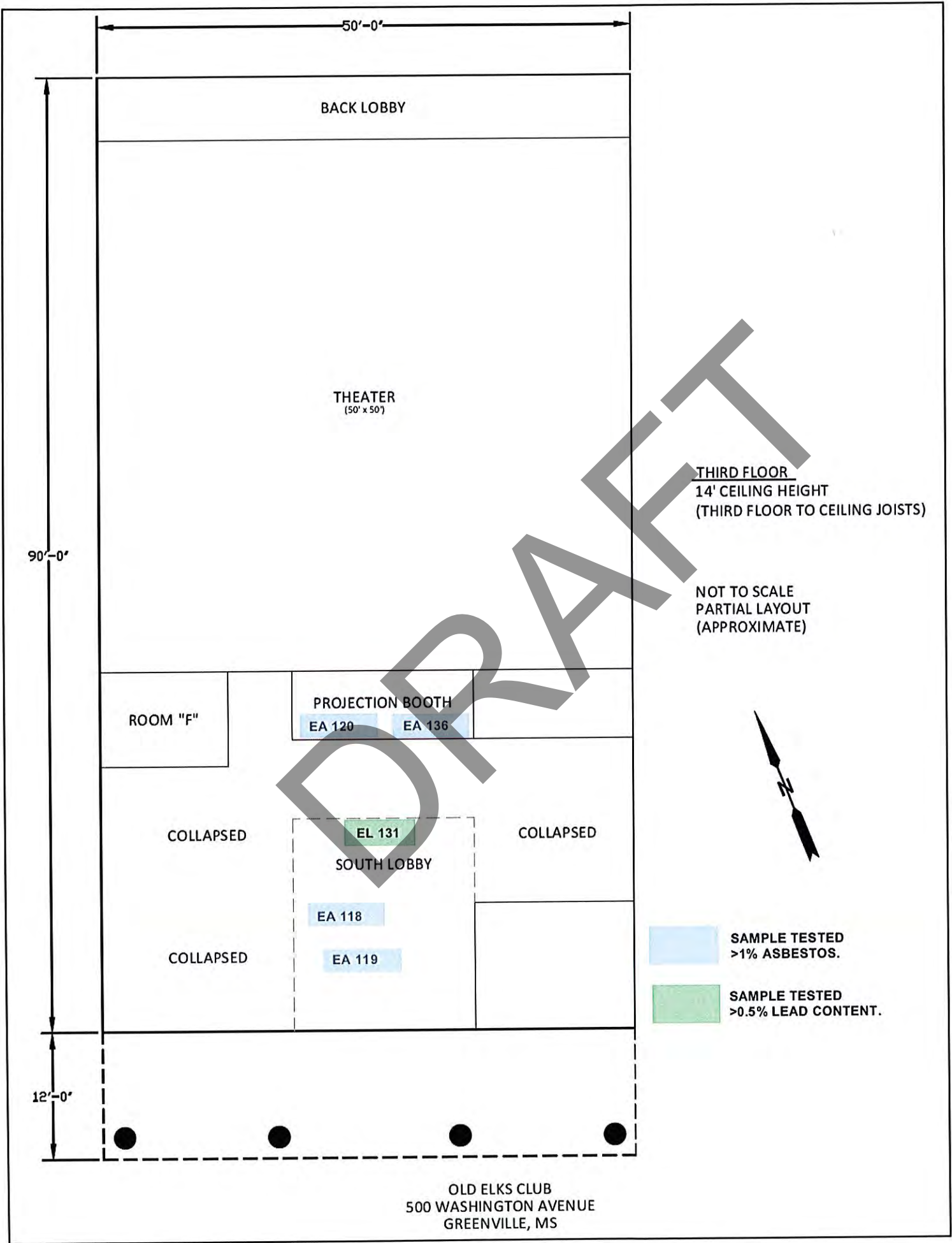
**OLD ELKS CLUB PROPERTY
500 WASHINGTON AVENUE
GREENVILLE, MS 38701**

SEE SAMPLE LOCATIONS ON ATTACHED FLOOR LAYOUTS.

EL 105	EAST WALL, 1 ST FLOOR, SOUTH END	30 S.F., ORANGE ON WOOD TRIM
EL 106	CEILING, 1 ST FLOOR HALLWAY, SOUTH END	300 S.F., WHITE ON CEILING TIN
EL 109	CEILING, 1 ST FLOOR, ROOM C	600 S.F., WHITE ON CEILING TIN, 2 ND LAYER
EL 112	EAST WALL, 1 ST FLOOR HALLWAY, NORTH END	30 S.F., ORANGE ON TRIM
EL 114	CEILING, 1 ST FLOOR HALLWAY, NORTH END	300 S.F., WHITE N CEILING TIN
EL 115	BACK ENTRANCE, NORTH WALL, 1 ST FLOOR	500 S.F., GREEN ON PLASTER WALL
EL 124	EAST WALL, 2 ND FLOOR, BALLROOM	400 S.F., YELLOW ON PLASTER WALL
EL 131	SOUTH HALL, NORTH WALL, 3 RD FLOOR	100 S.F., ORANGE ON PLASTER WALL
EL 140	SOUTH ENTRANCE DOOR, 2 ND FLOOR , EXTERIOR	30 S.F., WHITE ON WOOD
EL 141	SOUTH ENTRANCE DOOR FRAME, 2 ND FLOOR, EXTERIOR	20 S.F., WHITE ON WOOD







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Appendix C
Professional Credentials



STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
GARY C. RIKARD, EXECUTIVE DIRECTOR

April 11, 2018

Vance L. Nimrod
323 Central Street
Greenville, Mississippi 38701

Re: Certificate of Licensure
Lead Inspector Certification

Your application for certification as a Lead Inspector has been approved by the Lead Certification Branch in accordance with the Mississippi Regulations for Lead-Based Paint Activities, Miss. Code Annotated Sections 49-17-501 through 49-17-531. Your Mississippi Certification number is PBI-00001068 which is reflected on your enclosed Mississippi Certification identification card or certificate.

Your Mississippi Certification is valid through Apr 10th, 2019. In order to maintain certification as a Lead Inspector, you must renew your license on or before the expiration date stated on your card or certificate and pay the renewal fee. If you should continue to perform lead-based paint activities after the expiration date, you will be in violation of the Mississippi Regulations for Lead-Based Paint Activities and may be cited for non-compliance.

It is your responsibility to ensure that you have met all the requirements for renewal of your lead certification.

If you have any questions, please feel free to contact Virginia Rickels at (601) 961-5777.

Sincerely,

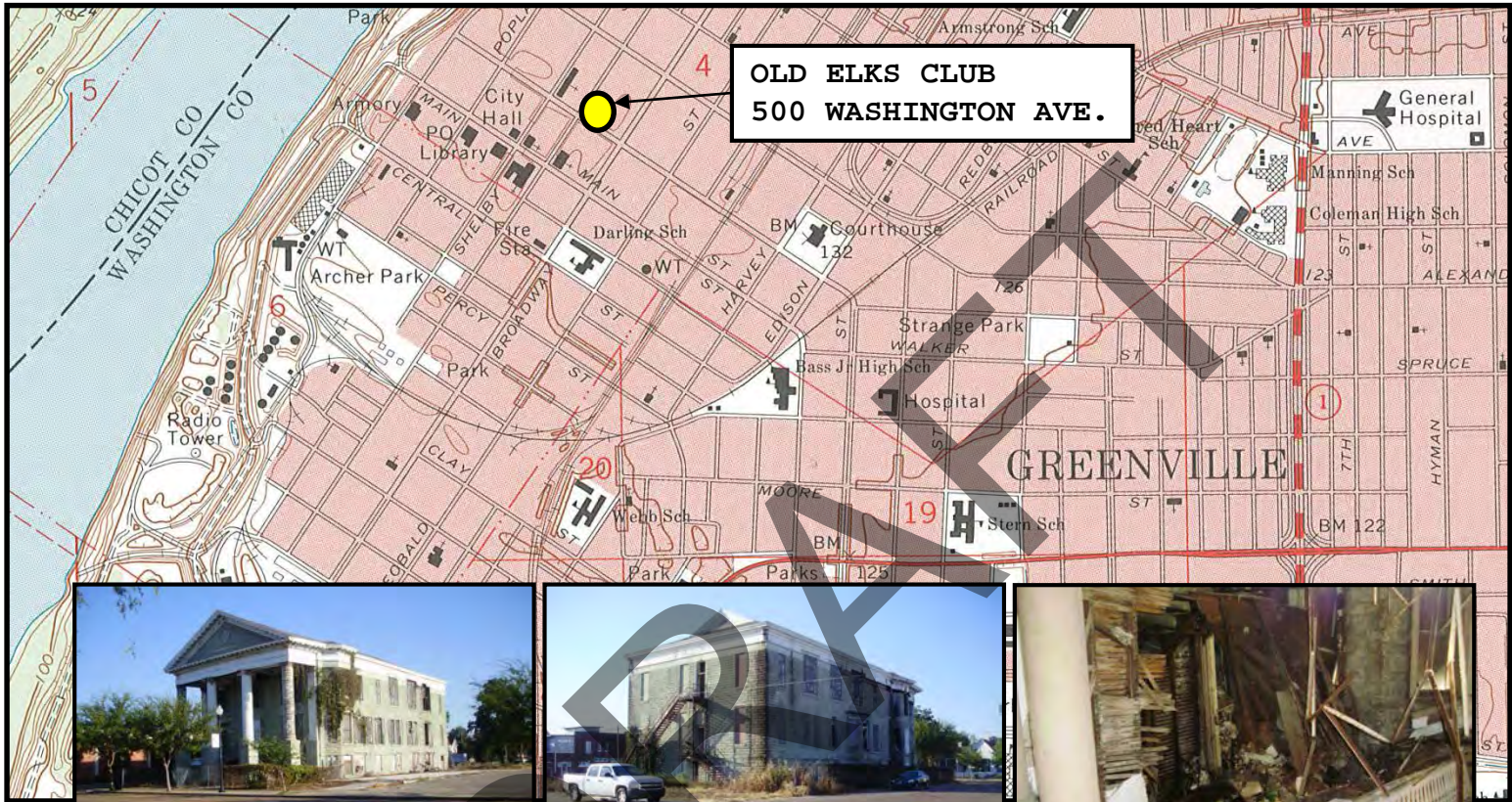
Mr. Connie Simmons, P.E., Chief
Asbestos & Lead Certification Branch

Enclosure

48341 LIC20180001

Asbestos Survey of Old Elks Club

500 Washington Ave.
Greenville, MS



Submitted to:

Mr. William L. Burle, Jr.

W.L. Burle, Engineers, P.A
111 South Walnut Street
Greenville, MS 38701

October 5, 2018

Asbestos Inspection Performed by:

Vance Nimrod, P.E.

323 Central Street
Greenville, MS 38701
(662)820-9612

Email: vance.nimrod@gmail.com

Prepared for the City of Greenville, MS
Conducted under the EPA Brownfields
Cooperative Agreement No. BF-00D60317



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APPENDICES:

Appendix A: Asbestos Sampling Locations

Appendix B: Laboratory Asbestos Report

Appendix C: Professional Credentials

Appendix D: State of Mississippi Demolition/Renovation Notification Form

1.0 PURPOSE AND SCOPE OF SERVICES

Vance Nimrod, P.E., (VN) was retained by W. L. Burle, Engineers, P.A. (BURLE) on behalf of the City of Greenville, MS, to conduct a survey to identify any asbestos in or on the Old Elks Club Property located at 500 Washington Avenue, Greenville, MS. The survey was performed under and funded by the City of Greenville through their 2017 Environmental Protection Agency (EPA) Assessment Grant.

VN conducted the asbestos survey in accordance with the approved scope of work listed below:

1. **Interview with Knowledgeable Person(s)** - VN attempted to meet with person or persons who are familiar with past construction and renovation activities of the facility planned for demolition.
2. **Preliminary Walk-Through** - VN conducted a preliminary walk-through of the facility to locate any suspect asbestos containing materials.
3. **Sampling Program** - VN developed a sampling program for the facility. The asbestos sampling was performed by VN, a Mississippi Certified Asbestos Inspector, under the EPA and Mississippi Department of Environmental Quality (MDEQ) approved Generic Quality Assurance Project Plan (QAPP) dated January 5, 2018.
4. **Report** - VN prepared a report which documents the work performed, references the test results, and tabulates any asbestos containing materials encountered on-site.

2.0 REGULATORY BACKGROUND

Asbestos is a naturally occurring mineral that has seen widespread use in building construction materials because of its many desirable properties for building construction. Some of these properties include, but are not limited to, fire resistance, insulation, poor conductivity, and high tensile strength. Due to these desirable properties asbestos can be found in such products as: siding and roofing shingles, concrete, wall board, insulation, gaskets, acoustical plaster, asphalt, vinyl floor tile, joint compounds, adhesives, and many other products. The problem with asbestos, however, is the adverse health effects associated with exposure to asbestos fibers. Asbestos has been linked with health conditions such as Asbestosis, lung cancer, Mesothelioma, and several other types of cancers.

As a result of these adverse health risks Congress passed the Asbestos Hazard Emergency Response Act (AHERA) which is administered by the U.S. Environmental Protection Agency (EPA). AHERA required that schools (K-12th grade), identify asbestos containing materials (ACMs), develop a plan to manage the asbestos, and to implement that plan in a timely manner. Another regulation that was passed that requires asbestos inspection is the National Emission Standards for

Hazardous Air Pollutants (NESHAP). NESHAP requires that buildings, with the exception of private residences, that are scheduled for demolition or renovation be inspected for ACMs to prevent the emission of asbestos into the environment. The Occupation Safety and Health Administration (OSHA) has also mandated asbestos inspection activities to enhance worker safety. Most states, including the State of Mississippi, require that all asbestos inspection work be done by a certified inspector.

3.0 SITE DESCRIPTION

The project site is a three-story masonry block building that is framed primarily with wood and has a pitched roof. There is a facade of decorative masonry blocks on the exterior walls. It is approximately 50 feet wide and 90 feet deep. Total floor space is approximately 13,500 square feet. The roof is extended approximately 12 feet south to protect the entrance from the elements. The extended roof is supported by four large pillars. See sketches of each floor in Appendix A.

The building is in poor condition primarily from roof leaks from the old roof that was replaced in approximately year 2000. The building is also in poor condition from roof leaks from the new roof. Multi stairways at the front of the building have collapsed. Most of the other water damage is along the interior sides of the building.

A terrazzo floor covers almost the entire first floor. One room on the east side, labeled Room D, has floor tile on the terrazzo. The second and third floor have a wood base. The second floor is mostly covered with floor tile with some ceramic tile in the south foyer. There is a limited amount of floor tile on the third floor south of the theater.

4.0 SITE SURVEY PROTOCOL

Homogenous sampling areas are defined as areas in which the materials are uniform in appearance, such as color and texture, and were installed during the same time period.

VN has established a standard asbestos materials survey report form which allows the collection of assessment data in the field. The suspect ACM is classified by site location, material type, accessibility, physical condition, friability, and activity level. By definition, friable material may be crumbled, pulverized, or reduced to a powder by hand pressure. Hazard assessment concerns itself more with friable ACM because the material can release asbestos fibers which may become airborne, thus creating an air quality exposure problem. The survey and sampling program was limited to visible and accessible materials and did not include inaccessible areas. The sampling locations are referenced in Appendix A.

The following suspect ACMs were identified and sampled:

Surfacing Materials

1. Ceiling Texture
2. Wall Texture

Thermal System Insulation Materials

1. Duct Insulation

Miscellaneous Materials

1. Floor Tile and Mastic
2. Vinyl Flooring and Mastic
3. Ceiling Tile
4. Theater Curtain
5. Sheet rock
6. Original Plaster
7. Roof Shingles
8. Roof Felt

A total of 42 samples of suspect ACMs were collected on September 4 and 10, 2018. The samples were submitted to EMSL Analytical, Inc. for analysis. A total of 80 tests were run of these samples.

5.0 ANALYTICAL PROTOCOL

The contract laboratory for the project is EMSL Analytical, Inc. of Baton Rouge, LA. EMSL conducted all asbestos material analyses in accordance with standard protocol utilizing PLM with dispersion staining techniques. All samples were pre-screened to establish visual characterization and to determine relative percentages of material content. All materials determined to contain more than one percent (> 1%) of any type of asbestos were classified as ACM and must be handled in accordance with Environmental Protection Agency (EPA) and OSHA regulations pertaining to renovation and/or removal.

6.0 DISCUSSION OF SAMPLING RESULTS

A review of the laboratory results reveals the following:

6.1 Asbestos suspect material samples that were found to contain greater than 1% of asbestos are identified below:

1. 17 samples of non-friable 9" and 12" floor tile tested 2% to 6% chrysotile asbestos.

2. 17 samples of non-friable mastic under 9" and 12" floor tile tested 8% to 10% chrysotile asbestos.
3. Two (2) samples of non-friable vinyl floor cover and mastic in Room E, 2nd floor, tested 3% to 4% chrysotile asbestos.
4. Three (3) samples of friable texture on the 2nd floor tested 3% to 4% chrysotile asbestos.
5. One (1) sample of friable texture on the 3rd floor tested 3% chrysotile asbestos.
6. Two (2) samples of friable sheetrock joint compound on the 2nd and 3rd floors tested 3% chrysotile asbestos.

Appendix B shows the laboratory results for each sample that was found to contain more than 1.0% asbestos.

6.2 Asbestos suspect material samples that tested non-detectable, or less than 1%, for asbestos are as follows:

1. Three (3) samples of texture from the first floor.
2. One (1) sample of texture from the third floor.
3. Sheet Rock
4. Original Plaster
5. Ceiling Tile
6. Duct Insulation
7. Theater Curtain
8. Roof Shingles
9. Roof Felt

Appendix B shows the laboratory results for each sample that was found to contain less than 1% of asbestos.

6.3 Appendix B also includes additional work on the asbestos containing material samples that contain more than 1% asbestos. These pages are color-coded. The 26 samples are first listed by sample number, location and an approximate quantity of asbestos containing material on the site.

The location of the actual samples taken are shown in color on the 1st, 2nd and 3rd floor layouts that follow.

7.0 LIMITATIONS AND RECOMMENDATIONS

7.1 Limitations

- 7.1.1 Some of the floor tile was inaccessible due to collapsed stairways and water damage at the side walls. However, most of the floor tile was accessible and can be safely removed.

7.1.2 The limited amount of friable wall and ceiling texture and joint compound that contains more than 1% asbestos will be difficult to remove. The texture is approximately 1/8" thick and is mostly troweled on smooth. It is difficult to identify. Some has collapsed from the leaking roofs. There will be safety issues to address due to weak floor support.

7.1.3 Shingles still in place on the roof were not sampled due to the lack of an operating City lift; however, there were singles and felt that had apparently blown off of the roof and were on the ground on the east side of the building. Three samples of these shingles and felt were collected and each tested. No asbestos was detected in the roof and felt samples.

7.2. Recommendations

7.2.1 Alternative I

- 1. Prior to any demolition work being performed, all asbestos containing materials that contain 1.0% or more of asbestos should be removed from the building.**
 - a. All floor tile and mastic found in both first and second layers.**
 - b. All vinyl floor covering and mastic.**
 - c. The ceiling and wall texture and joint compound that tested more than 1% asbestos.**
- 2. A licensed asbestos contractor should perform all asbestos abatement work as required by MDEQ.**
- 3. At least ten (10) days prior to any demolition work being performed, a State of Mississippi Demolition/Renovation Notification Form should be sent to MDEQ. A sample form is referenced in Appendix D.**

7.2.2 Alternative II

- 1. Demolish the whole building, including the asbestos containing materials, using a continuous system of wetting to minimize the amount of asbestos that gets airborne.**
- 2. All demolished building materials, including the asbestos building material, should be hauled to a landfill that is certified to receive asbestos containing materials.**
- 3. A licensed asbestos contractor should perform all asbestos abatement work as required by MDEQ.**


4. At least ten (10) days prior to any demolition work being performed, a State of Mississippi Demolition/Renovation Notification Form should be sent to MDEQ. A sample form is referenced in Appendix D.

8.0 QUALIFYING STATEMENT

VN presents the findings, conclusions, and recommendations herein which are based solely on the conditions observed during the inspection conducted on September 4th and 10th, 2018. Additionally, VN does not make any representation or projection as to past conditions or future exposures and does not extend its findings to areas outside of the statistical representation of the completed investigation.

The findings and conclusions of this report are not scientific certainties, but rather, probabilities based on professional judgment concerning the significance of the data gathered during the course of the site investigation. This report has been prepared for the exclusive use by W.L. Burle, Engineers, P.A. and its associated firms and entities. This report and its analytical results, findings, conclusions, and recommendations either in part or in its entirety are not to be used by any other party without prior consent by W. L. Burle, Engineers, P.A.

9.0 SIGNATURE OF ASBESTOS INSPECTOR



Vance Nimrod, P.E.
Mississippi Certified Asbestos Inspector
Certificate No.: ABI-00001505
October 5, 2018

10.0 QUALIFICATION OF ASBESTOS INSPECTOR

Qualification(s) of the asbestos inspector that prepared this report are referenced in Appendix C.

- End of Report -

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Appendix A
Asbestos Sampling Locations

5472

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Asbestos Survey

Vance Nimrod, 9/4/18

Sample Locations

Sample	No.	Material	Location	Comments
1st Floor				
EA	101	9" Tile & Mastic, Red	Room D, South End	Poor Condition
EA	102	9" Tile & Mastic, Red	Room D, North End	Poor Condition
EA	103	9" Tile & Mastic, White	Room D, North End	Poor Condition
2nd Floor				
EA	104	Vinal & Mastic, Beige, Top Layer	Room E	Fair Condition
EA	105	Vinal & Mastic, Beige, Top Layer	Room E	Fair Condition
EA	106	12" Tile & Mastic, Cream, Top Layer	Ballroom, SW	Fair Condition
EA	107	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, SW	Fair Condition
EA	108	12" Tile & Mastic, Cream, Top Layer	Ballroom, SE	Fair Condition
EA	109	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, SE	Fair Condition
EA	110	12" Tile & Mastic, Cream, Top Layer	Ballroom, NE	Fair Condition
EA	111	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, NE	Fair Condition
EA	112	12" Tile & Mastic, Cream, Top Layer	Ballroom, NW	Fair Condition
EA	113	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, NW	Fair Condition
EA	114	12" Tile & Mastic, Cream, Top Layer	Back Hall	Poor Condition
EA	115	9" Tile & Mastic, Cream, 2nd Layer	Back Hall	Poor Condition
EA	116	12" Tile & Mastic, Cream, Top Layer	RR, NW Corner	Poor Condition
EA	117	9" Tile & Mastic, Cream, 2nd Layer	RR, NW Corner	Poor Condition
3rd Floor				
EA	118	9" Tile & Mastic, Gray	South Hallway, North	Poor Condition
EA	119	9" Tile & Mastic, Gray	South Hallway, South	Poor Condition
EA	120	9" Tile & Mastic, Gray	Projection Room	Poor Condition
1st Floor, Walls & Ceilings				
EA	121	1/2" Sheet Rock, Ceiling	Front Hallway	Poor Condition
EA	122	1/2" Orig Plaster, Wall	Front Hallway, North	Poor Condition
EA	123	12" Ceiling Tile	Room D	Poor Condition
EA	124	3/8" Sheet Rock, Ceiling	Kitchenette	Poor Condition
EA	125	1/2" Orig Plaster, Wall	Kitchenette, North	Poor Condition
2nd Floor, Walls & Ceilings				
EA	126	1/2" Orig Plaster Ceiling	South Hallway	Poor Condition
EA	127	Sheet Rock, Wall,	South Hallway, North	Poor Condition
EA	128	1/2" Orig Plaster, Wall	South Hallway, North	Poor Condition
EA	129	2X4 Ceiling Tile	Ball Room, West Side	Fair Condition
EA	130	2X4 Ceiling Tile	Ball Room, East Side	Fair Condition
EA	131	Sheet Rock, Wall,	Ball Room, North	Poor Condition
3rd Floor, Walls & Ceilings				
EA	132	Orig Plaster Wall	South Hallway	Poor Condition
EA	133	Fiber Glass Duct Insulation	Next To South Hallway	Poor Condition
EA	134	Fiber Glass Duct Insulation	Side Room	Poor Condition
EA	135	Theater Curtian, Orange	Theater Room	Poor Condition

5472

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Asbestos Survey

Vance Nimrod, 9/10/18

Sample Locations

Sample	No.	Material	Location	Comments
3rd Floor Walls and Ceiling, Continued				
EA	136	Sheet Rock, Wall	Projection Booth	
Exterior				
EA	137	Roof Shingle	East Side, North End	Detached
EA	138	Roof Felt	East Side, North End	Detached
EA	139	Roof Shingle	East Side, Center	Detached
EA	140	Roof Felt	East Side, Center	Detached
EA	141	Roof Shingle	East Side, South End	Detached
EA	142	Roof Felt	East Side, South End	Detached

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Appendix B
Laboratory Asbestos Report

**EMSL Analytical, Inc.**

18369 Petroleum Drive Baton Rouge, LA 70809
 Tel/Fax: (225) 755-1920 / (225) 755-1989
<http://www.EMSL.com/batonrougelab@emsl.com>

EMSL Order: 251805472

Customer ID: VNMS42

Customer PO:

Project ID:

Attention: Vance Nimrod
 Vance Nimrod
 323 Central Street
 Greenville, MS 38701

Phone: (662) 820-9612

Fax:

Received Date: 09/12/2018 10:25 AM

Analysis Date: 09/17/2018 - 09/19/2018

Collected Date: 09/04/2018 - 09/10/2018

Project: ELKS CLUB

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
EA101-Floor Tile 251805472-0001	1st Floor Room D South End - 9" Tile & Mastic Red	Red Non-Fibrous Homogeneous		94% Non-fibrous (Other)	6% Chrysotile
EA101-Mastic 251805472-0001A	1st Floor Room D South End - 9" Tile & Mastic Red	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA102-Floor Tile 251805472-0002	1st Floor Room D North End - 9" Tile & Mastic Red	Red Non-Fibrous Homogeneous		94% Non-fibrous (Other)	6% Chrysotile
EA102-Mastic 251805472-0002A	1st Floor Room D North End - 9" Tile & Mastic Red	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA103-Floor Tile 251805472-0003	1st Floor Room D North End - 9" Tile & Mastic White	Tan Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
EA103-Mastic 251805472-0003A	1st Floor Room D North End - 9" Tile & Mastic White	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA104 251805472-0004	2nd Floor Room E - Vinyl & Mastic Beige Top Layer	Tan Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile ✓
EA105-Floor Tile 251805472-0005	2nd Floor Room E - Vinyl & Mastic Beige Top Layer	Tan/Beige Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile ✓
EA105-Adhesive 251805472-0005A	2nd Floor Room E - Vinyl & Mastic Beige Top Layer	Gray/Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected ✓
EA105-Backing/Leveler 251805472-0005B	2nd Floor Room E - Vinyl & Mastic Beige Top Layer	Gray/Black Fibrous Heterogeneous	10% Cellulose 20% Synthetic	70% Non-fibrous (Other)	None Detected ✓
EA106-Floor Tile 251805472-0006	2nd Floor Ballroom SW - 12" Tile & Mastic Cream Top Layer	Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
EA106-Mastic 251805472-0006A	2nd Floor Ballroom SW - 12" Tile & Mastic Cream Top Layer	Black Non-Fibrous Homogeneous		92% Non-fibrous (Other)	8% Chrysotile
EA107-Floor Tile 251805472-0007	2nd Floor Ballroom SW - 9" Tile & Mastic Cream 2nd Layer	Gray Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA107-Mastic 251805472-0007A	2nd Floor Ballroom SW - 9" Tile & Mastic Cream 2nd Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA108-Floor Tile 251805472-0008	2nd Floor Ballroom SE - 12" Tile & Mastic Cream Top Layer	Gray/Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile

Initial report from: 09/19/2018 18:31:55

**EMSL Analytical, Inc.**

18369 Petroleum Drive Baton Rouge, LA 70809

Tel/Fax: (225) 755-1920 / (225) 755-1989

<http://www.EMSL.com / batonrougelab@emsl.com>

EMSL Order: 251805472

Customer ID: VNMS42

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
EA108-Mastic 251805472-0008A	2nd Floor Ballroom SE - 12" Tile & Mastic Cream Top Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA109-Floor Tile 251805472-0009	2nd Floor Ballroom SE - 9" Tile & Mastic Cream 2nd Layer	Gray Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA109-Mastic 251805472-0009A	2nd Floor Ballroom SE - 9" Tile & Mastic Cream 2nd Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA110-Floor Tile 251805472-0010	2nd Floor Ballroom NE - 12" Tile & Mastic Cream Top Layer	Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
EA110-Mastic 251805472-0010A	2nd Floor Ballroom NE - 12" Tile & Mastic Cream Top Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA111-Floor Tile 251805472-0011	2nd Floor Ballroom NE - 9" Tile & Mastic Cream 2nd Layer	Gray Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA111-Mastic 251805472-0011A	2nd Floor Ballroom NE - 9" Tile & Mastic Cream 2nd Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA112-Floor Tile 251805472-0012	2nd Floor Ballroom NW - 12" Tile & Mastic Cream Top Layer	Gray Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA112-Mastic 251805472-0012A	2nd Floor Ballroom NW - 12" Tile & Mastic Cream Top Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA113-Mastic 1 251805472-0013	2nd Floor Ballroom NW - 9" Tile & Mastic Cream 2nd Layer	Tan/Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA113-Floor Tile 251805472-0013A	2nd Floor Ballroom NW - 9" Tile & Mastic Cream 2nd Layer	Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
EA113-Mastic 2 251805472-0013B	2nd Floor Ballroom NW - 9" Tile & Mastic Cream 2nd Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA114-Floor Tile 251805472-0014	2nd Floor Back Hall - 12" Tile & Mastic Cream Top Layer	Gray Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA114-Mastic 251805472-0014A	2nd Floor Back Hall - 12" Tile & Mastic Cream Top Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA115-Mastic 1 251805472-0015	2nd Floor Back Hall - 9" Tile & Mastic Cream 2nd Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA115-Floor Tile 251805472-0015A	2nd Floor Back Hall - 9" Tile & Mastic Cream 2nd Layer	Tan Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
EA115-Mastic 2 251805472-0015B	2nd Floor Back Hall - 9" Tile & Mastic Cream 2nd Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA116-Floor Tile 251805472-0016	2nd Floor RR NW Corner - 12" Tile & Mastic Cream Top Layer	Beige Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile

Initial report from: 09/19/2018 18:31:55



EMSL Analytical, Inc.

18369 Petroleum Drive Baton Rouge, LA 70809
 Tel/Fax: (225) 755-1920 / (225) 755-1989
<http://www.EMSL.com/batonrougelab@emsl.com>

EMSL Order: 251805472

Customer ID: VNMS42

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
EA116-Mastic 251805472-0016A	2nd Floor RR NW Corner - 12" Tile & Mastic Cream Top Layer	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA117-Mastic 1 251805472-0017	2nd Floor RR NW Corner - 9" Tile & Mastic Cream 2nd Layer	Tan/Yellow Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
EA117-Floor Tile 251805472-0017A	2nd Floor RR NW Corner - 9" Tile & Mastic Cream 2nd Layer	Tan Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA117-Mastic 2 251805472-0017B	2nd Floor RR NW Corner - 9" Tile & Mastic Cream 2nd Layer	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA118-Floor Tile 251805472-0018	3rd Floor South Hallway North - 9" Tile & Mastic Gray	Gray Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
EA118-Mastic 251805472-0018A	3rd Floor South Hallway North - 9" Tile & Mastic Gray	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA119-Floor Tile 251805472-0019	3rd Floor South Hallway South - 9" Tile & Mastic Gray	Gray Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
EA119-Mastic 251805472-0019A	3rd Floor South Hallway South - 9" Tile & Mastic Gray	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA120-Floor Tile 251805472-0020	3rd Floor Projection Room - 9" Tile & Mastic Gray	Gray Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
EA120-Mastic 251805472-0020A	3rd Floor Projection Room - 9" Tile & Mastic Gray	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
EA121 251805472-0021	1st Floor Front Hallway - 1/2" Sheetrock Ceiling	White Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
EA122-Texture 251805472-0022	1st Floor Front Hallway North - 1/2" Orig Plaster Wall	Tan Non-Fibrous Homogeneous	4% Fibrous (Other)	96% Non-fibrous (Other)	None Detected
EA122-Skim Coat 251805472-0022A	1st Floor Front Hallway North - 1/2" Orig Plaster Wall	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA122-Plaster 251805472-0022B	1st Floor Front Hallway North - 1/2" Orig Plaster Wall	Brown Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
EA123 251805472-0023	1st Floor Room D - 12" Ceiling Tile	Brown Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
EA124-Texture 251805472-0024	1st Floor Kitchenette - 3/8" Sheetrock Ceiling	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA124-Drywall 251805472-0024A	1st Floor Kitchenette - 3/8" Sheetrock Ceiling	Beige Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
EA125-Texture 251805472-0025	1st Floor Kitchenette North - 1/2" Orig Plaster Wall	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 09/19/2018 18:31:55

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EMSL Order: 251805472

Customer ID: VNMS42

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
EA125-Skim Coat 251805472-0025A	1st Floor Kitchenette North - 1/2" Orig Plaster Wall	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA125-Plaster 251805472-0025B	1st Floor Kitchenette North - 1/2" Orig Plaster Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA126-Texture 251805472-0026	2nd Floor South Hallway - 1/2" Orig Plaster Ceiling	Beige Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
EA126-Plaster 251805472-0026A	2nd Floor South Hallway - 1/2" Orig Plaster Ceiling	Tan Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
EA127-Texture 251805472-0027	2nd Floor South Hallway North - Sheetrock Wall	White Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA127-Joint Compound 251805472-0027A	2nd Floor South Hallway North - Sheetrock Wall	White Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA127-Drywall 251805472-0027B	2nd Floor South Hallway North - Sheetrock Wall	White Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
EA128-Skim Coat 251805472-0028	2nd Floor South Hallway North - 1/2' Orig Plaster Wall	White Non-Fibrous Homogeneous	5% Fibrous (Other)	95% Non-fibrous (Other)	None Detected
EA128-Plaster 251805472-0028A	2nd Floor South Hallway North - 1/2' Orig Plaster Wall	Brown/Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA129 251805472-0029	2nd Floor Ball Room West Side - 2x4 Ceiling Tile	White/Yellow Fibrous Homogeneous	95% Glass <1% Fibrous (Other)	5% Non-fibrous (Other)	None Detected
EA130 251805472-0030	2nd Floor Ball Room East Side - 2x4 Ceiling Tile	White/Yellow Fibrous Homogeneous	98% Glass	2% Non-fibrous (Other)	None Detected
EA131-Texture 251805472-0031	2nd Floor Ball Room North - Sheetrock Wall	White Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA131-Drywall 251805472-0031A	2nd Floor Ball Room North - Sheetrock Wall	White Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
EA132-Texture 251805472-0032	3rd Floor South Hallway - Orig Plaster Wall	Beige Non-Fibrous Homogeneous	<1% Fibrous (Other)	100% Non-fibrous (Other)	None Detected
EA132-Skim Coat 251805472-0032A	3rd Floor South Hallway - Orig Plaster Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA132-Plaster 251805472-0032B	3rd Floor South Hallway - Orig Plaster Wall	Brown Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
EA133-Wrap 251805472-0033	3rd Floor Next to South Hallway - Fiberglass Duct Insulation	Brown/Black/Silver Fibrous Heterogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
EA133-Insulation 251805472-0033A	3rd Floor Next to South Hallway - Fiberglass Duct Insulation	Brown Fibrous Homogeneous	95% Glass	5% Non-fibrous (Other)	None Detected

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EMSL Order: 251805472

Customer ID: VNMS42

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
EA134 251805472-0034	3rd Floor Side Room - Fiberglass Duct Insulation	Pink Fibrous Homogeneous	95% Glass	5% Non-fibrous (Other)	None Detected
EA135 251805472-0035	3rd Floor Theater Room - Theater Curtain Orange	Brown Fibrous Homogeneous	98% Synthetic	2% Non-fibrous (Other)	None Detected
EA136-Texture 251805472-0036	3rd Floor Project Booth - Sheetrock Wall	White Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA136-Joint Compound 251805472-0036A	3rd Floor Project Booth - Sheetrock Wall	White Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
EA136-Drywall 251805472-0036B	3rd Floor Project Booth - Sheetrock Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
EA137 251805472-0037	Exterior East Side North End - Roof Shingle	Black Fibrous Heterogeneous	10% Glass	90% Non-fibrous (Other)	None Detected
EA138 251805472-0038	Exterior East Side North End - Roof Felt	Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
EA139 251805472-0039	Exterior East Side Center - Roof Shingle	Black Fibrous Heterogeneous	10% Glass	90% Non-fibrous (Other)	None Detected
EA140 251805472-0040	Exterior East Side Center - Roof Felt	Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
EA141 251805472-0041	Exterior East Side South End - Roof Shingle	Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
EA142 251805472-0042	Exterior East Side South End - Roof Felt	Black Fibrous Homogeneous	10% Glass	90% Non-fibrous (Other)	None Detected

Analyst(s)

Joshua Brunet (29)

Jamie Laginess (5)

Jurnee West (46)

Jamie Laginess

Jamie Laginess, Laboratory Operations Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method"), but augmented with procedures outlined in the 1993 ("final") version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Baton Rouge, LA NVLAP Lab Code 200375-0, LELAP 01950, TX 300238

Initial report from: 09/19/2018 18:31:55



EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING

Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

EMSL ANALYTICAL, INC.
18369 PETROLEUM DRIVE
BATON ROUGE, LA. 70809

PHONE: (225) 755-1920

FAX: (225) 755-1989

Company: <u>VANCE NIMROD</u>		EMSL-Bill to: <input type="checkbox"/> Same <input type="checkbox"/> Different If Bill to is Different note instructions in Comments**	
Street: <u>323 CENTRAL STREET</u>		Third Party Billing requires written authorization from third party	
City: <u>GREENVILLE</u>	State/Province: <u>MS</u>	Zip/Postal Code: <u>38701</u>	Country: <u>USA</u>
Report To (Name): <u>VANCE NIMROD</u>		Fax #:	
Telephone #: <u>662 820 9612</u>		Email Address: <u>VANCE.NIMROD@GMAIL.COM</u>	
Project Name/Number: <u>ELKS CLUB</u>			
Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email		Purchase Order:	U.S. State Samples Taken: <u>42</u>
Turnaround Time (TAT) Options* - Please Check			
<input type="checkbox"/> 3 Hour <input type="checkbox"/> 6 Hour <input type="checkbox"/> 24 Hour <input type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input checked="" type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week			
<small>*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.</small>			
PCM - Air <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA PLM - Bulk (reporting limit) <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NIOSH 9002 (<1%)		TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312 TEM - Bulk <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	
		TEM- Dust <input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167) Soil/Rock/Vermiculite <input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity) <input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity) <input type="checkbox"/> EPA Protocol (Semi-Quantitative) <input type="checkbox"/> EPA Protocol (Quantitative) Other: <input type="checkbox"/>	
<input type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group			
Samplers Name: <u>VANCE NIMROD</u>		Samplers Signature: <u>Vance Nimrod</u>	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
	SEE ATTACHED LIST OF		
	42 SAMPLES IN		
	2 BAGS		
	EA 101 To EA 142		9/4/10
Client Sample # (s):		Total # of Samples: <u>42</u>	
Relinquished (Client): <u>Vance Nimrod</u>		Date: <u>9/11/10</u>	Time: <u>1600</u>
Received (Lab):		Date:	Time:
Comments/Special Instructions:			

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Asbestos Survey

Vance Nimrod, 9/4/18

Sample Locations

Sample	No.	Material	Location	Comments
1st Floor				
EA	101	9" Tile & Mastic, Red	Room D, South End	Poor Condition
EA	102	9" Tile & Mastic, Red	Room D, North End	Poor Condition
EA	103	9" Tile & Mastic, White	Room D, North End	Poor Condition
2nd Floor				
EA	104	Vinal & Mastic, Beige, Top Layer	Room E	Fair Condition
EA	105	Vinal & Mastic, Beige, Top Layer	Room E	Fair Condition
EA	106	12" Tile & Mastic, Cream, Top Layer	Ballroom, SW	Fair Condition
EA	107	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, SW	Fair Condition
EA	108	12" Tile & Mastic, Cream, Top Layer	Ballroom, SE	Fair Condition
EA	109	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, SE	Fair Condition
EA	110	12" Tile & Mastic, Cream, Top Layer	Ballroom, NE	Fair Condition
EA	111	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, NE	Fair Condition
EA	112	12" Tile & Mastic, Cream, Top Layer	Ballroom, NW	Fair Condition
EA	113	9" Tile & Mastic, Cream, 2nd Layer	Ballroom, NW	Fair Condition
EA	114	12" Tile & Mastic, Cream, Top Layer	Back Hall	Poor Condition
EA	115	9" Tile & Mastic, Cream, 2nd Layer	Back Hall	Poor Condition
EA	116	12" Tile & Mastic, Cream, Top Layer	RR, NW Corner	Poor Condition
EA	117	9" Tile & Mastic, Cream, 2nd Layer	RR, NW Corner	Poor Condition
3rd Floor				
EA	118	9" Tile & Mastic, Gray	South Hallway, North	Poor Condition
EA	119	9" Tile & Mastic, Gray	South Hallway, South	Poor Condition
EA	120	9" Tile & Mastic, Gray	Projection Room	Poor Condition
1st Floor, Walls & Ceilings				
EA	121	1/2" Sheet Rock, Ceiling	Front Hallway	Poor Condition
EA	122	1/2" Orig Plaster, Wall	Front Hallway, North	Poor Condition
EA	123	12" Ceiling Tile	Room D	Poor Condition
EA	124	3/8" Sheet Rock, Ceiling	Kitchenette	Poor Condition
EA	125	1/2" Orig Plaster, Wall	Kitchenette, North	Poor Condition
2nd Floor, Walls & Ceilings				
EA	126	1/2" Orig Plaster Ceiling	South Hallway	Poor Condition
EA	127	Sheet Rock, Wall,	South Hallway, North	Poor Condition
EA	128	1/2' Orig Plaster, Wall	South Hallway, North	Poor Condition
EA	129	2X4 Ceiling Tile	Ball Room, West Side	Fair Condition
EA	130	2X4 Ceiling Tile	Ball Room, East Side	Fair Condition
EA	131	Sheet Rock, Wall,	Ball Room, North	Poor Condition
3rd Floor, Walls & Ceilings				
EA	132	Orig Plaster Wall	South Hallway	Poor Condition
EA	133	Fiber Glass Duct Insulation	Next To South Hallway	Poor Condition
EA	134	Fiber Glass Duct Insulation	Side Room	Poor Condition
EA	135	Theater Curtian, Orange	Theater Room	Poor Condition

Elks Club, 500 Washington Avenue, Greenville, MS 38701

Asbestos Survey

Vance Nimrod, 9/10/18

Sample Locations

Sample	No.	Material	Location	Comments
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3rd Floor Walls and Ceiling, Continued

EA	136	Sheet Rock, Wall	Projection Booth	
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Exterior

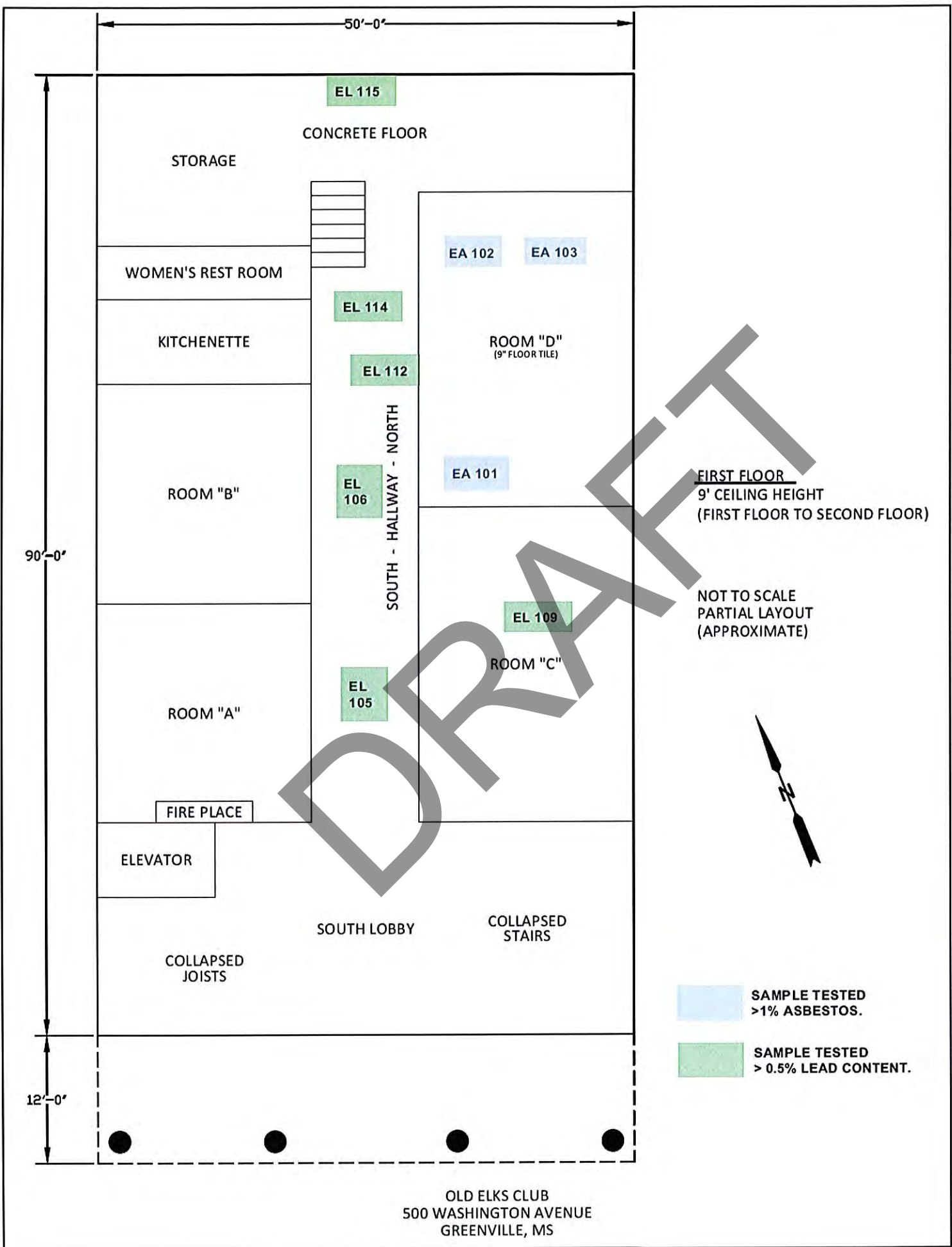
EA	137	Roof Shingle	East Side, North End	Detached
EA	138	Roof Felt	East Side, North End	Detached
EA	139	Roof Shingle	East Side, Center	Detached
EA	140	Roof Felt	East Side, Center	Detached
EA	141	Roof Shingle	East Side, South End	Detached
EA	142	Roof Felt	East Side, South End	Detached

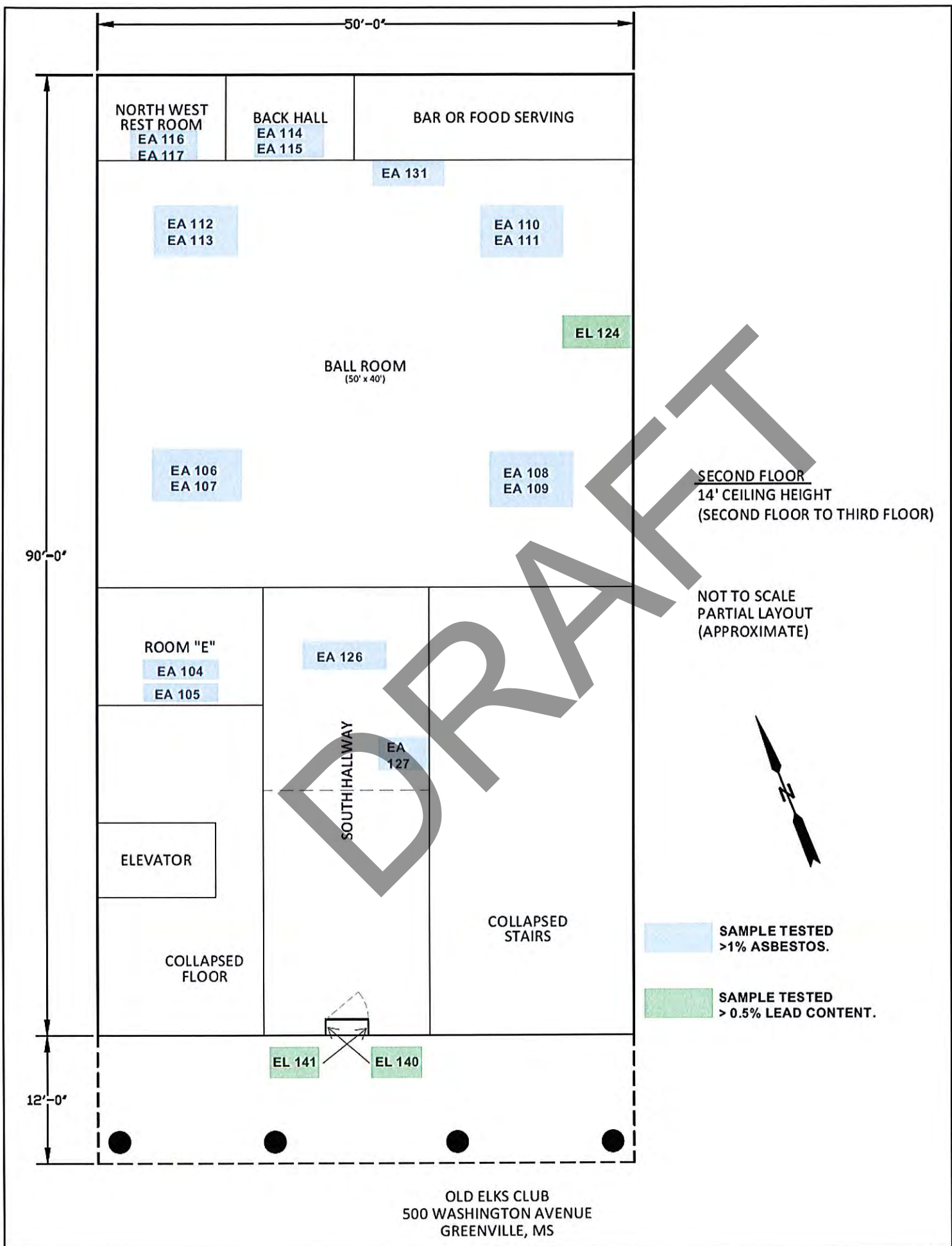
**SAMPLE NUMBERS OF ASBESTOS CONTAINING MATERIAL AND
APPROXIMATE QUANTITIES OF MATERIAL.**

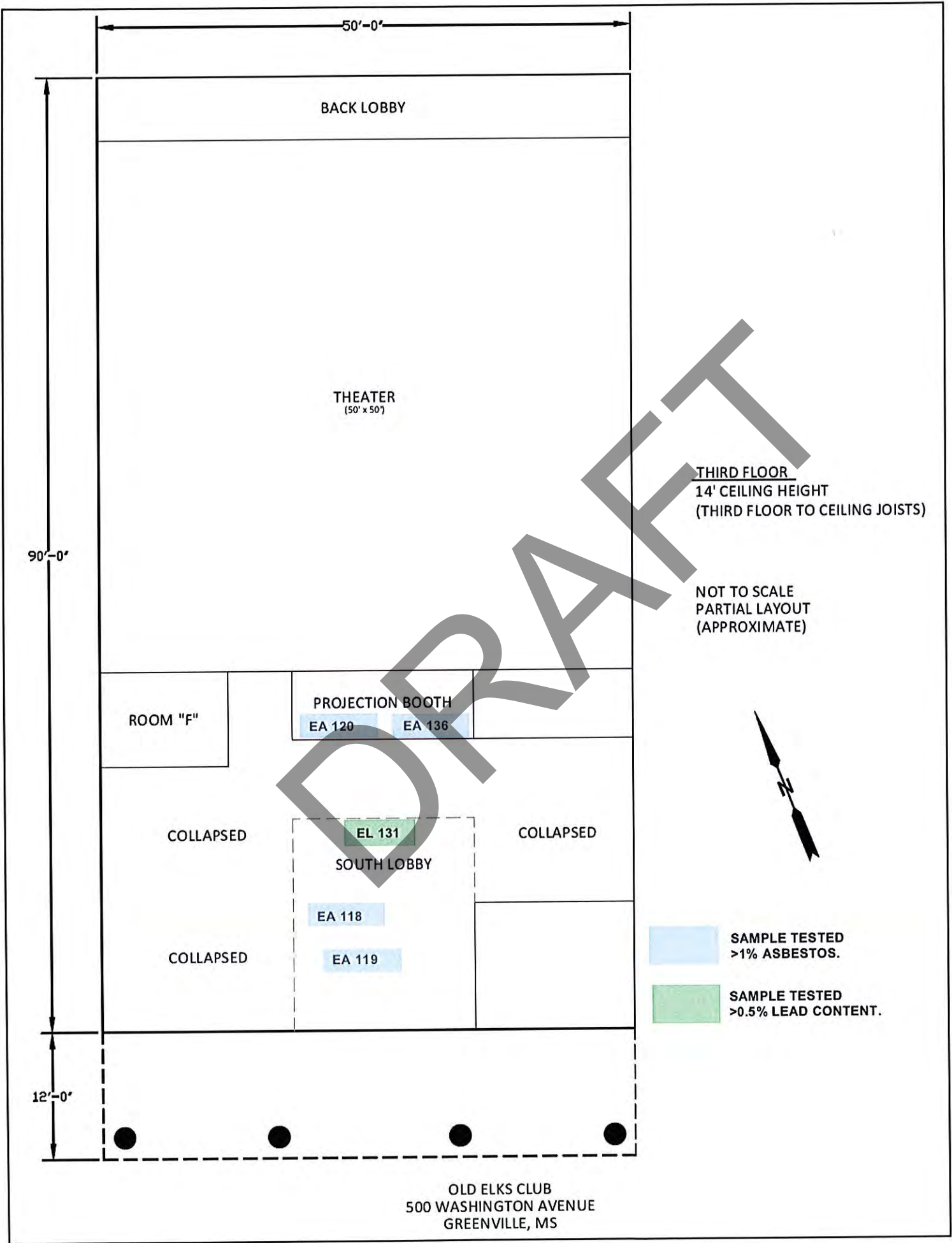
**OLD ELKS CLUB PROPERTY
500 WASHINGTON AVENUE
GREENVILLE, MS 38701**

SEE SAMPLE LOCATIONS ON ATTACHED FLOOR LAYOUTS.

SAMPLE NO.	LOCATION	QUANTITY
EA 101 EA 102 EA 103	ROOM D, 1 ST FLOOR	600 S.F. OF SURFACE AREA FOR 1 LAYER OF WHITE AND RED 9" FLOOR TILE AND 1 LAYER OF MASTIC
EA 104 EA 105	ROOM E, 2 ND FLOOR	150 S.F. OF SURFACE AREA FOR VINYL AND MASTIC
EA 106 EA 107 EA 108 EA 109 EA 110 EA 111 EA 112 EA 113	BALLROOM, 2 ND FLOOR	2,000 S.F. OF SURFACE AREA OF 2 LAYERS OF FLOOR TILE (9" AND 12") AND 2 LAYERS OF MASTIC
EA 114 EA 115	BACK HALL, 2 ND FLOOR	100 S.F. OF SURFACE AREA FOR 2 LAYERS OF FLOOR TILE (9" AND 12") AND 2 LAYERS OF MASTIC
EA 116 EA 117	NW R.R., 2 ND FLOOR	100 S.F. OF SURFACE AREA FOR 2 LAYERS OF FLOOR TILE (9" AND 12") AND 2 LAYERS OF MASTIC
EA 118 EA 119	SOUTH LOBBY, 3 RD FLOOR	300 S.F. OF SURFACE AREA FOR 2 LAYERS OF FLOOR TILE (9" AND 12") AND 2 LAYERS OF MASTIC
EA 120	PROJECTION ROOM, 3 RD FLOOR	50 S.F. OF SURFACE AREA FOR 9" FLOOR TILE AND MASTIC
EA 126	SOUTH HALLWAY, 2 ND FLOOR	300 S.F. OF 1/8" TROWELED ON TEXTURE ON CEILING
EA 127	SOUTH HALLWAY, 2 ND FLOOR	200 S.F. OF 1/8" TROWELED ON TEXTURE ON WALLS OF SHEETROCK
EA 127		100 S.F. OF 1/16" JOINT COMPOUND ON WALLS OF SHEETROCK
EA 131	BALLROOM, NORTH WALL, 2 ND FLOOR	300 S.F. OF 1/8" TROWELED ON WALL TEXTURE
EA 136	PROJECTION ROOM, 3 RD FLOOR	50 S.F. OF 1/8" TROWELED ON WALL TEXTURE
EA 136		50 S.F. OF 1/16" JOINT COMPOUND







DRAFT

Appendix C
Professional Credentials

State of Mississippi

*Department of Environmental Quality
Office of Pollution Control*

Certificate of Licensure

In accordance with the Asbestos Abatement Accreditation and Certification Act,
Enacted as 1989 Mississippi Law, Chapter 505


Be it known that

Vance Nimrod

Having submitted acceptable evidence of qualifications and
training and other appropriate information, is hereby granted this

***Asbestos Inspector
Certification***

*Certificate No.: ABI-00001505
Expiration Date: Apr 5th, 2019
Training Expires on Apr 5th, 2019*



Chief, Asbestos & Lead Certification Branch

40892 LIC20180001

Appendix D
State of Mississippi Demolition/Renovation Notification Form

MISSISSIPPI ASBESTOS DEMOLITION/RENOVATION NOTIFICATION FORM

Mail notification to: MDEQ Asbestos Section, 515 E. Amite Street, Jackson, MS 39201

Operator Project #		Postmark		Date Received (MDEQ use only)		Notification # (MDEQ use only)	
I. Type of Notification (O=Original R=Revised C=Canceled A= Annual)							
II. TYPE OF OPERATION (D=Demo O= Ordered Demo R=Renovation E=Emer. Renovation)							
III. FACILITY DESCRIPTION (Include building name, number and floor or room number)							
Bldg. Name:							
Address							
City:				State:		Zip:	
Site Location:				Tel:			
Building Size				# of Floors:		Age in Years:	
Present Use:				Prior Use:			
IV. FACILITY INFORMATION (Identify owner, removal contractor, and other operator)							
OWNER NAME:							
Address:							
City:				State:		Zip:	
Contact:				Tel:			
REMOVAL CONTRACTOR							
Address:							
City:				State:		Zip:	
Contact:				Tel:			
OTHER OPERATOR:							
Address:							
City:				State:		Zip:	
Contact:							
V. IS ASBESTOS PRESENT? (Yes/No)							
VI. PROCEDURE, INCLUDING ANALYTICAL METHOD, IF APPROPRIATE, USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL (Include inspector name and date of inspection):							
VII. APPROXIMATE AMOUNT OF ASBESTOS INCLUDING:		RACM To Be Removed		Nonfriable Asbestos Material Not To Be Removed		Indicate Unit of Measurement Below	
1. Regulated ACM to be Removed 2. Category I ACM Not Removed 3. Category II ACM Not Removed				Category I	Category II	UNIT	
Pipes						LnFt:	Ln M:
Surface Area						SqFt:	Sq M:
Vol RACM Off Facility Component						CuFt:	Cu M:
VIII. SCHEDULED DATES ASBESTOS REMOVAL (MM/DD/YY) Start:						Complete:	
IX. SCHEDULED DATES DEMO/RENOVATION (MM/DD/YY) Start:						Complete:	

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:

XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION OR RENOVATION SITE:

XII. WASTE TRANSPORTER #1

Name:

Address:

City:

State:

Zip:

Contact Person:

Tel:

WASTE TRANSPORTER #2

Name:

Address:

City:

State:

Zip:

Contact Person:

Tel:

XIII. WASTE DISPOSAL SITE

Name:

Address:

City:

State:

Zip:

Tel:

XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY, PLEASE IDENTIFY THE AGENCY BELOW:

Name:

Title:

Authority:

Date of Order (MM/DD/YY):

Date Ordered to Begin (MM/DD/YY):

XV. FOR EMERGENCY RENOVATIONS:

Date and Hour of Emergency (MM/DD/YY):

Description of the sudden unexpected event:

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:

XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ONSITE DURING THE DEMOLITION OR RENOVATION, AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS.

Type or Print Name

(Signature of Owner/Operator)

(Date)

XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT:

Type or Print Name

(Signature of Owner/Operator)

(Date)

Appendix C2

**Excerpts from Cardno's
November 2018 Phase I ESA**

DRAFT

**Checklist for Phase I Site Assessments Conducted using EPA Brownfields
Assessment Grant Funds**

Contact Information

Grantee Name: City of Greenville

Grant Number: BF-00D60317-0

ACRES Property ID: 238143

Program Manager Name: Everett Chinn
(Point of Contact)

Contact Phone Number: 662-378-1501

Name / Address of Property Assessed: 500 Block of Washington Avenue, 504-536
Washington Avenue, Greenville, MS

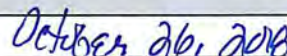
Checklist

Please indicate that each of the following All Appropriate Inquiries documentation requirements were met for the Phase I assessment conducted at the above listed property:

- ☒ An *opinion* as to whether the inquiry has identified conditions indicative of releases or threatened releases of hazardous substances, and as applicable, pollutants and contaminants, petroleum or petroleum products, or controlled substances, on, at, in, or to the subject property.
- ☒ An identification of "*significant*" data gaps (as defined in §312.10 of AAI final rule and §12.7 of ASTM E1527-05), if any, in the information collected for the inquiry, as well as comments regarding the significance of these data gaps. Significant data gaps including missing and unattainable information that affects the ability of the environmental professional to identify conditions indicative of releases or threatened releases of hazardous substances, and as applicable, pollutants and contaminants, petroleum or petroleum products, or controlled substances, on, at, in, or to the subject property.
- ☒ **Qualifications and signature** of the environmental professional(s). The environmental professional must place the following statements in the document and sign the document:
- ☒ "[I, We] declare that, to the best of [my, our] professional knowledge and belief, [I, we] meet the definition of Environmental Professional as defined in §312.10 of this part."
- ☐ "[I, We] have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. [I, We] have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312."
- Note: Please use either "I" or "We."**
- ☒ In compliance with §312.31(b) of the AAI final rule and §12.6.1 of ASTM E1527-05, the environmental professional must include in the final report an *opinion regarding additional appropriate investigation*, if the environmental professional has such an opinion.



Signature of Grantee Program Manager



Date

Phase I Environmental Site Assessment

500 Block of Washington Avenue
500 Washington Avenue
Greenville, Washington County, Mississippi

October 24, 2018

Prepared for:
City of Greenville
EPA Cooperative Agreement BF-00D60317-0



Phase I Environmental Site Assessment

Prepared for: City of Greenville
340 Main Street
Greenville, Mississippi 38701
EPA Cooperative Agreement BF-00D60317-0



Project Name: **Phase I Environmental Site Assessment**
500 block of Washington Avenue
500 Washington Avenue
Greenville, Washington County, Mississippi

Date: October 24, 2018

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1 Executive Summary

Cardno has completed a Phase I Environmental Site Assessment (ESA) of the 500 block of Washington Avenue in Greenville, Washington County, Mississippi 38703. The study property is herein referred to as "the Subject Site/Property" or "the Site." According to information provided by the City of Greenville, the Subject Property consists of seven parcels and is currently developed with a bank, vacant commercial building, and two vacant and dilapidated buildings. (**Figures 1 and 2**). Photos of the subject property and surrounding properties taken during the site visit are provided in **Appendix A**. This assessment was performed under and was funded by the City of Greenville Environmental Protection Agency (EPA) Brownfield Assessment Grant. The Subject Property was selected for assessment as it was identified as a catalyst site within the City of Greenville.

This assessment was performed to satisfy the requirements of the Client (City of Greenville) and their assign(s) with respect to potential environmental impairment and liabilities associated with the property due to contamination by hazardous substances, controlled substances or petroleum products on or near the site. **This Phase I Environmental Site Assessment generally follows the scope of ASTM Designation: E 1527-13 – Standard Practice for Environmental Site Assessments.** This report meets the general requirements for conducting all appropriate inquiry into the previous ownership, uses, and environmental conditions of a property, as specified in 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries. Furthermore, this work was conducted by or under the responsible charge of an environmental professional as defined in 40 CFR §312.10.

ASTM Standard Practice E1527-13 defines a Recognized Environmental Condition (REC) as:

"The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment, 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. The term is not intended to include *de Minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

ASTM Standard Practice E1527-13 defines a Controlled Recognized Environmental Condition (CREC) as:

"A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

ASTM Standard Practice E1527-13 defines a Historical Recognized Environmental Condition (HREC) as:

"A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls."

1.1 Findings and Conclusions

Cardno has performed this Phase I Environmental Site Assessment (ESA) of the property in conformance with the scope and limitations of ASTM Standard Practice E1527-13. Any exceptions to, or deletions from, this practice are described in Section 2.0 of this report. This assessment has revealed a series of recognized environmental conditions (RECs) in connection with the subject property:

FINDINGS AND CONCLUSIONS SUMMARY						
Report Section		Further Action?	De minimis Condition	REC and/or CREC	Historical REC	Description
4.0	User Provided Information	No	No	No	No	
5.1	Federal, State and Local Database Findings	Yes	No	Yes	No	Historic UST identified on-site at the former Greenville Buick/Pontiac Automotive dealership
5.2	Additional Environmental Record Sources	No	No	No	No	
5.3	Local Environmental Record Sources	No	No	No	No	
5.3	Historical Records Sources	Yes	No	Yes	No	Site contained historic USTs and automotive service stations / maintenance facilities. Off-site LUSTS
6.2	Hazardous Substance Use, Storage and Disposal	No	No	Yes	No	
6.3	Underground Storage Tanks	Yes	No	Yes	No	Site contained historic USTs, with one historic UST identified on-site.
6.4	Aboveground Storage Tanks	No	No	Yes	No	
6.5	Other Petroleum Products	No	No	No	No	
6.6	Polychlorinated Biphenyls (PCBs)	Yes	No	Yes	No	In-ground lifts identified on-site
6.7	Unidentified Substance Containers	No	No	No	No	
6.8	Nonhazardous Solid Waste	No	No	No	No	
6.9	Wastewater	No	No	No	No	
6.10	Waste Pits, Ponds and Lagoons	No	No	No	No	
6.11	Sumps	No	No	No	No	
6.12	Septic Systems	No	No	No	No	
6.13	Stormwater Management System	No	No	No	No	
6.14	Wells	No	No	No	No	
7.0	Subsurface Vapor Migration	No	No	No	No	
8.0	Interviews	No	No	No	No	
9.1	Asbestos Containing Material	Yes	No	No	No	Identified ACM and suspect ACM
9.2	Lead-Based Paint	Yes	No	No	No	Identified LBP and suspect LBP

Based on this Phase I ESA, Cardno identified the following RECs:

1. Buick/Pontiac Dealership

The Buick/Pontiac dealership was located at 522 Washington Avenue, and has been a historical automotive repair, parts storage, and vehicle maintenance facility from the late 1920s until the 1980s. During the site inspection, in-ground lifts were identified within the former maintenance area. Based on its current condition and historical use, there is potential from a release from this facility that may require additional investigation.

2. Buick/Pontiac Dealership - USTs

According to interviews and historical records, this facility supported one 800-gallon and one 400-gallon gasoline underground storage tanks (USTs), both installed in the early 1970s and reportedly out of use in the late 1980s. According to the Mississippi Department of Environmental Quality (MDEQ), the USTs are permanently out of use in the ground and have not been removed. During the site inspection, one vent pipe was located to the south of the north vacant building. Based on its current condition and historic use, there is potential for a release from the USTs that may require additional investigation.

3. Summerlin Gas Station

The Summerlin gas station was historically located at 536 Washington Avenue (location of the current Guaranty Bank and Trust Company). This facility operated between approximately 1940 and 1960. No records or information of the gas stations underground storage tanks (USTs) were identified with Mississippi Department of Environmental Quality (MDEQ). Reportedly the USTs were removed with the development of the current building in the early 1960s. Based on its historic use, there is potential for a release from this facility that may require additional investigation.

4. Mystic Rose Entertainment, Inc., the current owner of three of the seven parcels included in this report, did not grant Cardno access to the former automotive dealership located at 522 Washington Street and the vacant structures located along the northeastern portion of the Subject Property during this assessment. Given the historic automotive related uses, and potentially hazardous nature of these facilities, Cardno considers this lack of access as a REC in connection with the Subject Property.

Further Phase II ESA testing activities and/or other actions are recommended at this time to address the above RECs.

Based on this Phase I ESA result, several non-scope issues were identified and documented and further testing activities and/or other actions are recommended at this time.

1. An asbestos and lead-based paint inspection was conducted on the Elks Lodge (504 Washington Avenue) and completed in September 2018. The investigation identified the following asbestos containing materials:
 - o Various floor tiles and underlying mastic located throughout
 - o Texturing on walling and ceiling located throughout
 - o Drywall / joint compound walling and ceiling located throughout

The investigation identified the following lead containing painted surfaces:

- o Orange paint on wood trim located in the first floor hallway
- o White paint on ceiling trim located on the first floor hallway and second floor
- o Green paint on first floor back wall
- o Yellow paint on 2nd floor bathroom
- o Orange paint on third floor north wall

Prior to disturbance of the above identified materials during redevelopment or demolition activities, appropriate local, state, and federal regulations need to be followed.

2. Based on the age of the remaining buildings observed throughout the Subject Property, the possibility of lead-based paint on the interior/exterior to exists. Cardno recommends a lead-based paint survey be conducted prior to future site development activities.
3. Based on the age of the remaining buildings observed throughout the Subject Property, the possibility of asbestos-containing materials (ACM) exists. Cardno recommends an additional ACM survey be conducted prior to future site development activities.

Please note: This is a cursory summary of findings. The full report must be read in its entirety for a comprehensive understanding of the stated conclusions/recommendations

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2 Introduction

2.1 Purpose

The purpose of this Phase I ESA was to identify recognized environmental conditions in connection with the property at the time of the site reconnaissance. The scope of work for this Phase I ESA may also include certain potential environmental conditions beyond the scope of *ASTM Standard Practice E1527-13*. This report documents our findings, opinions and conclusions.

2.2 Detailed Scope of Services

This Phase I ESA was conducted in general accordance with the *ASTM Standard Practice E1527-13*, consistent with a level of care and skill ordinarily practiced by the environmental consulting profession currently providing similar services under similar circumstances. Significant additions, deletions or exceptions to *ASTM Standard Practice E1527-13* are noted below or in the corresponding sections of this report. The scope of this assessment included an evaluation of the following:

- Physical setting characteristics of the property through a review of referenced sources such as available topographic maps and geologic, soils and hydrogeological reports.
- Usage of the property, adjoining properties and surrounding area through a review of referenced historical sources such as land title records, fire insurance maps, city directories, aerial photographs, prior reports and interviews.
- Observations and interviews regarding current property usage and conditions including: the use, treatment, storage, disposal or generation of hazardous substances, petroleum products, hazardous wastes, nonhazardous solid wastes and wastewater.
- Usage of adjoining and surrounding area properties and the likely impact of known or suspected releases of hazardous substances or petroleum products from those properties in, on or at the property.
- Information in referenced environmental agency databases and local environmental records, within the specified approximate minimum search distance from the property.
- Potential for subsurface vapor migration in, on or at the property.
- Field Environmental Report consisting of a data review, site reconnaissance, and ecological report to determine if the subject site supports any wetlands, and if so, the next steps required with the US Army Corps of Engineers to address the wetlands. Also a determination of any potential threatened and endangered species.

Additionally, an Asbestos-Containing Building Materials (ACM) and Lead-Based Paint (LBP) inspection was performed on the former Elks Lodge building, located along the southwestern corner of the Subject Property, at 504 Washington Avenue. These assessments, although not required by the *ASTM Standard Practices E1527-13*, were requested by the Client and expressed in Cardno's August 13, 2018 proposal.

No other investigations or other quantitative/qualitative testing was performed as part of this assessment, and no other work was performed as part of this assessment that was not required by the *ASTM Standard Practices E1527-13*. These non-scope issues include, but are not limited to, the following: Radon, Lead in Drinking Water, Regulatory Compliance, Cultural and Historic Resources,

Industrial Hygiene, Health and Safety, Geotechnical Evaluation, Sinkhole Evaluation, Indoor Air Quality, Vapor Intrusion, Biological Agents, and Mold.

2.3 Significant Assumptions

While this report provides an overview of potential environmental concerns, both past and present, the environmental assessment is limited by the availability of information at the time of the assessment. It is possible that unreported disposal of waste or illegal activities impairing the environmental status of the property may have occurred which could not be identified.

The conclusions and recommendations regarding environmental conditions that are presented in this report are based on a scope of work authorized by the Client. Please note however, that virtually no scope of work, no matter how exhaustive, can identify all contaminants or all conditions above and below ground. Cardno also assumes that the Client and other interested parties will read this report in its entirety.

2.4 Limitations, Exceptions, Deviations and/or Data Gaps

Cardno has prepared this Phase I ESA report using reasonable efforts to identify recognized environmental conditions associated with hazardous substances or petroleum products in, on or at the property. Findings contained within this report are based on information collected from observations made on the day (September 21, 2018) of the site reconnaissance and from reasonably ascertainable information obtained from certain public agencies and other referenced sources.

The *ASTM Standard Practice E1527-13* recognizes inherent limitations for Phase I ESAs, including, but not limited to:

- *Uncertainty Not Eliminated* – A Phase I ESA cannot completely eliminate uncertainty regarding the potential for recognized environmental conditions in connection with any property.
- *Not Exhaustive* – A Phase I ESA is not an exhaustive investigation of the property and environmental conditions on such property.
- *Past Uses of the Property* – Phase I requirements only require review of standard historical sources at five-year intervals. Therefore, past uses of property at less than five-year intervals may not be discovered.

Users of this report may refer to *ASTM Standard Practice E1527-13* for further information regarding these and other limitations. This report is not definitive and should not be assumed to be a complete and/or specific definition of all conditions above or below grade. Current subsurface conditions may differ from the conditions determined by surface observations, interviews, and reviews of historical sources. The most reliable method of evaluating subsurface conditions is through intrusive techniques, which are beyond the scope of this report. Information in this report is not intended to be used as a construction document and should not be used for demolition, renovation, or other property construction purposes. Any use of this report by any party, beyond the scope and intent of the original parties, shall be at the sole risk and expense of such user.

Cardno makes no representation or warranty that the past or current operations at the property are, or have been, in compliance with all applicable federal, state and local laws, regulations and codes. This report does not warrant against future operations or conditions, nor does it warrant against operations or conditions present of a type or at a location not investigated. Regardless of the findings stated in

this report, Cardno is not responsible for consequences or conditions arising from facts not fully disclosed to Cardno during the assessment.

An independent data research company provided the government agency database referenced in this report. Information on surrounding area properties was requested for approximate minimum search distances and is assumed to be correct and complete unless obviously contradicted by Cardno's observations or other credible referenced sources reviewed during the assessment. Cardno shall not be liable for any such database firm's failure to make relevant files or documents properly available, to properly index files, or otherwise to fail to maintain or produce accurate or complete records.

Cardno makes no warranty, guarantee or certification regarding the quality, accuracy, or reliability of any prior report provided to Cardno and discussed in this Phase I ESA report. Cardno expressly disclaims any and all liability for any errors or omissions contained in any prior reports provided to Cardno and discussed in this Phase I ESA report.

Cardno used reasonable efforts to identify evidence of aboveground and underground storage tanks and ancillary equipment on the property during the assessment. "Reasonable efforts" were limited to observation of accessible areas, review of referenced public records, and interviews. These reasonable efforts may not identify subsurface equipment or evidence hidden from view by things including, but not limited to, vegetation, paving, construction activities, stored materials, and landscaping.

Any estimates of costs or quantities in this report are approximations for commercial real estate transaction due diligence purposes and are based on the findings, opinions and conclusions of this assessment, which are limited by the scope of the assessment, schedule demands, cost constraints, accessibility limitations and other factors associated with performing the Phase I ESA. Subsequent determinations of costs or quantities may vary from the estimates in this report. The estimated costs or quantities in this report are not intended to be used for financial disclosure related to the *Financial Accounting Standards Board (FASB) Statement No. 143, FASB Interpretation No. 47, Sarbanes/Oxley Act* or any United States Securities and Exchange Commission reporting obligations, and may not be used for such purposes in any form without the express written permission of Cardno.

Cardno did not act as a professional title insurance or land surveyor firm as part of this investigation, and makes no guarantee, express or implied, that any land title records acquired or reviewed in this report, or any physical descriptions or depictions of the property in this report, represent a comprehensive definition or precise delineation of property ownership or boundaries.

The Environmental Professional Statement in Section 1.1 of this report does not "certify" the findings contained in this report and is not a legal opinion of such Environmental Professional. The statement is intended to document Cardno's opinion that an individual meeting the qualifications of an Environmental Professional was involved in the performance of the assessment and that the activities performed by, or under the supervision of, the Environmental Professional were performed in conformance with the standards and practices set forth in 40 CFR Part 312 per the methodology in *ASTM Standard Practice E1527-13* and the scope of work for this assessment.

Per *ASTM Standard Practice E1527-13, Section 6, User Responsibilities*, the User of this assessment has specific obligations for performing tasks during this assessment that will help identify the possibility of recognized environmental conditions in connection with the property. Failure by the User to fully comply with the requirements may impact their ability to use this report to help qualify for Landowner Liability Protections (LLPs) under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Cardno makes no representations or warranties

regarding a User's qualification for protection under any federal, state or local laws, rules or regulations.

In accordance with the *ASTM Standard Practice E1527-13*, this report is presumed to be valid for a six-month period. If the report is older than six months, the following information must be updated in order for the report to be valid: (1) regulatory review, (2) site visit, (3) interviews, (4) specialized knowledge and (5) environmental liens search. Reports older than one year may not meet *the ASTM Standard Practice E1527-13* and therefore, the entire report must be updated to reflect current conditions and property-specific information.

Mystic Rose Entertainment, Inc., the current owner three of the seven parcels included in this report, did not grant Cardno access to the former automotive dealership located at 522 Washington Street and the vacant structures located along the northeastern portion of the Subject Property during this assessment. The inability to access these buildings, with respect to their historical uses as automotive repair and maintenance facilities, is considered a significant data gap and a Recognized Environmental Concern (REC).

Some areas within the former Elks Lodge, located at 504 Washington Avenue were inaccessible due to deteriorations of the building's structural integrity. This damage was mostly caused by water leaks and the degradation of stairways. Although this is considered a data gap, Cardno believes this data gap did not affect the ability to identify RECs.

Furthermore, Cardno was not granted access during this assessment into secure areas (vault, secured-storage and other high-security areas) within the Guaranty Bank and Trust Company building, located at 536 Washington Avenue. Although this is considered a data gap, Cardno believes this data gap did not effect the ability to identify RECs.

Other limitations and exceptions that are specific to the scope of this report may be found in corresponding sections.

No other significant deviations or data gaps likely to affect the environmental professional's ability to identify RECs were observed or encountered during preparation of this report.

2.5 Special Terms and Conditions (User Reliance)

This report is for the use and benefit of, and may be relied upon by the City of Greenville, as well as any of their affiliates respective successors and assigns, in connection with a commercial real estate transaction involving the property, and in accordance with the terms and conditions in place between Cardno and the Client for this project. Any third party agrees by accepting this report that any use or reliance on this report shall be limited by the exceptions and limitations in this report, and with the acknowledgment that actual site conditions may change with time, and that hidden conditions may exist at the property that were not discovered within the authorized scope of the assessment. Any use by or distribution of this report to third parties, without the express written consent of Cardno is at the sole risk and expense of such third party.

Cardno makes no other representation to any third party except that it has used the degree of care and skill ordinarily exercised by environmental consultants in the preparation of the report and in the assembling of data and information related thereto. No other warranties are made to any third party, either expressed or implied.

3 Site Description

3.1 Location and Legal Description

The Subject Property is located on the northwest side of Greenville, Mississippi, approximately 1.50 miles northwest of its city center. The Subject Property is comprised of seven adjoining parcels, encompassing approximately 3.6-acres, outlined below:

- **504 Washington Avenue:** Former Elks fraternity Lodge, constructed in 1906. This three-story structure is currently vacant. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10372000000, PPIN 10504, and is currently owned by the City of Greenville.
- **508 Washington Avenue:** Concrete slab-on-grade parking lot, previously in association with the Elk Lodge located at 504 Washington Avenue. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10372600000, PPIN 10505, and is currently owned by the City of Greenville.
- **Surface Lot North #1:** located between 508 and 522 Washington Avenue – formerly utilized as a club-house between approximately 1915 and 1950, as well as a slab-on-grade parking lot. According to the Washington county Tax Assessors database, these properties are identified as Parcel ID# 10370800000, PPIN 10502. This lot is currently owned by Mystic Rose Entertainment, Inc., and site access was not provided.
- **Surface Lot #2:** Located north of 504 Washington Avenue – formerly a slab-on-grade parking lot. According to the Washington County Tax Assessor, this property is identified as Parcel ID# 10371400000, PPIN 10503. This lot is currently owned by Boykin AQLICB, LLC.
- **522 Washington Avenue:** Two-story former Greenville Buick-Pontiac dealership, constructed circa 1926. According to the Washington county Tax Assessors database, this property is currently identified as Parcel ID# 10365400000, PPIN 10493. This facility is currently owned by Mystic Rose Entertainment, Inc., and site access was not provided.
- **536 Washington Avenue:** Guaranty Bank & Trust building and associated concrete parking lot – currently in use. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10364800000, PPIN 10492. This property is currently owned by Guaranty Bank & Trust.
- **A single-story and one additional two-story vacant structure:** Located on the northeast portion of the Subject Property. According to the Washington county Tax Assessors database, this property is identified as Parcel ID# 10365600000, PPIN 30609. This property is currently owned by Mystic Rose Entertainment, Inc., and site access was not provided.

The Subject Property is predominantly vacant (with the exception of the Guaranty Bank and the second floor of the 522 Washington Avenue structure) and is mostly developed with slab-on-grade concrete, with some light vegetation along the northern portions (as generally depicted in **Figures 1 and 2a**). The facility is located north of Washington Avenue, west of North Broadway Street, east of North Hinds Street, and south of West Alexander Street. According to the Washington County Tax Assessor, the property is owned by various individuals, companies, and the City of Greenville.

3.2 Surrounding Area General Characteristics

The Subject Property is located in a generally residential and commercial area northwest of downtown Greenville, Mississippi.

Historically, the surrounding area has been developed with a mix of commercial and residential land uses since at least the mid-1890s. The area surrounding the Subject Property represents much of downtown Greenville and has witnessed intermittent phases of development and recession.

Majority of the property to the north, west, and east is commercial with a few interspersed residential structures. The subject site is adjoined to the north by residential structures. Specific adjacent and abutting properties are summarized in Section 3.5. A surrounding land use map is included as **Figure 3**.

3.3 Current Use of the Property

At the time of this report, the Subject Property was developed with six separate structures including a vacant clubhouse, a historic car dealership / apartment building, a two-story vacant automotive repair facility structure, a single-story vacant automotive storage facility, and a currently occupied two-story bank.

3.4 Descriptions of Property Improvements

Approximate Size of Property	3.6 acres.
General Topography of Property	The majority of the site is relatively flat with very minor slopes towards the east and north. Overall the site is relatively flat, likely due to position along the Mississippi Delta region.
Adjoining and/or Ingress/Egress Roads	An access road, Sunflower Lane, is located through the center of the Subject Property, in a NE/SW direction. The Subject Property is bordered by Washington Avenue to the south, North Broadway Street to the east, and North Hines Street to the west.
Paved Areas	Majority of the Subject Property was paved at the time of this report, with the exception of the northernmost parcel, which included low-lying vegetation and some grassed areas.
Unimproved Areas	There are no unimproved lands within the boundaries of the Subject Property.
Landscaped Areas	Landscaped grass is located along the northeastern portion of the Subject Property.
Surface Water	None observed.
Potable Water Source	City of Greenville.
Sanitary Sewer Utility	Available.
Electrical Utility	Available.
Natural Gas Utility	None observed.
Current Occupancy Status	Only occupied structure includes the Guaranty Bank and Trust Company, located at 536 Washington Avenue.
Unoccupied Buildings/Spaces/Structures	The Subject Property is predominantly vacant, including three open slab-on-grade parking lots, and four vacant structures.

Building Name or General Building Description	The Subject Property includes the following historic and/or current buildings: former Elks Lodge at 504 Washington Avenue, the former Greenville Buick-Pontiac Company at 522 Washington Avenue, as well as the currently-occupied Guaranty Bank and Trust Company at 536 Washington Avenue. Additionally, two former automotive storage facilities are located near the northern boundary of the Subject Property.
Number of Floors	Elks Lodge Structure (3-story), Greenville Buick/Pontiac automotive dealership (2-story), Guaranty Bank (2-story), former automotive storage facility (1-story and 2-story).
Approximate Total Square Footage of Structure(s)	Elks Lodge: ~7,250 square feet (SF) Greenville Buick/Pontiac automotive dealership: ~9,700 SF Guaranty Bank: ~7,250 SF Former automotive storage (1 Story): 1,500 SF Former automotive storage (2 story): 11,200 SF
Construction Completion Year	Elks Lodge: ~1906 Greenville Buick/Pontiac automotive dealership: ~1930 Guaranty Bank: ~1960 Former automotive storage (1 Story): ~1960 Former automotive storage (2 story): ~1960

3.5 Current Uses of Adjoining Properties

Direction from Property	Occupant(s) Name	Current Use	Potential REC(s)
North	Single-family residences	Residential	None
Northwest	Single-family residences	Residential	None
West	Planters Bank & Trust	Bank, commercial	None
West	First United Methodist Church	Religious	None
Southwest	Vacant building	Retail	None
South	The Lofts at 517	Residential	None
South	Barefield Workplace; Kim's Fashion; Delta Teaching Supply	Retail and commercial	None
Southeast	Downtown Butcher and Mercantile	Retail, restaurant	None
East	Trustmark Insurance	Office, commercial	None
East	Parking lot	Parking	None

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4 User Provided Information

4.1 Title Records

This service was not requested by the Client as part of this assessment, nor did the User (Client) provide title record information. The most recent title records available with the Washington County Tax Assessor were reviewed by Cardno during this assessment. The latest tax assessor records indicate that the City of Greenville, as well as various other individuals are the current owners of the Subject Property.

4.2 Environmental Liens or Activity and Use Limitations (AULs)

The User provided no information regarding property environmental liens or activity and use limitations. However, any liens and AULs associated with the property (if any) are anticipated to be addressed by the End User/Current Site Owner as part of the land/title transaction process.

4.3 Specialized Knowledge

The User provided no specialized knowledge regarding recognized environmental conditions associated with the property (**Appendix B**).

4.4 Valuation Reduction for Environmental Issues

The User provided no information regarding a significant valuation reduction for environmental issues associated with the Subject Property (**Appendix B**).

4.5 Owner, Property Manager, and Occupant Information

The Subject Property is owned and managed by various individuals and entities. The Subject Site is predominantly vacant, with the exception of Guaranty Bank & Trust, located at 536 Washington Avenue as well as the 2nd floor of the former Greenville Buick automotive dealership, located at 522 Washington Avenue.

4.6 Reason for Performing Phase I

This assessment was performed to satisfy the requirements of the Client and other interested parties with respect to potential environmental impairment associated with the property due to contamination by hazardous substances, controlled substances, or petroleum products on or near the site. The Subject Site was selected by the City of Greenville as a potential location for future development. In addition, this assessment was performed to fill any data gaps identified in prior environmental assessments.

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5 Records Review

The purpose of the records review is to obtain and review records that will help identify RECs in connection with the property. Some records reviewed pertain not only to the property, but also to properties within an additional approximate minimum search distance in order to help assess the likelihood of problems from migrating hazardous substances or petroleum products. Unless stated otherwise the approximate minimum search distances used below were as specified in *ASTM Standard 1527-13*.

5.1 Standard Environmental Record Sources

The regulatory agency database radius report discussed in this section, provided by GeoSearch, Inc. (GeoSearch), was reviewed for information regarding reported use or release of hazardous substances and petroleum products on or near the property. Unless otherwise noted, the information provided by the regulatory agency database report and other sources referenced in this report, were considered sufficient for recognized environmental condition (REC), controlled recognized environmental condition (CREC), historical recognized environmental condition (HREC) or de minimis condition determinations without conducting supplemental agency file reviews.

Cardno also reviewed the "unmappable" (also referred to as "orphan") listings within the database report, cross-referencing available address information and facility names. Unmappable sites are listings that could not be plotted with confidence, but are potentially in the general area of the property, based on the partial street address, city, or zip code. Any unmappable site that was identified by Cardno as being within the approximate minimum search distance from the property, based on the site reconnaissance and/or cross-referencing to mapped listings is included in the discussion within this section. The complete regulatory agency database report may be found in **Appendix C**. The following is a summary of the findings of the database review:

Regulatory Database	Minimum Search Distance	Subject Property Listed?	No. of Sites Listed
Federal National Priority List (NPL)	1 mile	No	0
Federal Delisted NPL	½ mile	No	1
Federal Superfund Enterprise Management System (SEMS)	½ mile	No	2
Brownfields Management System	½ mile	No	5
Federal Superfund Enterprise Management System Archived Site Inventory (SEMSARCH) list	½ mile	No	0
Federal Resource Conservation and Recovery Act (RCRA), Corrective Action facilities (CORRACTS)	1 mile	No	0
Federal RCRIS non-CORRACTS Treatment, Storage, and Disposal Facilities (TSD)	½ mile	No	0
Facility Registry System	Property	Yes	1
Federal Institutional Control/Engineering Control Registry	½ mile	No	0

Regulatory Database	Minimum Search Distance	Subject Property Listed?	No. of Sites Listed
Federal Emergency Response Notification System (ERNS) list	Property	No	0
Federal Facility Index System/Facility Registry System (FRSMS)	Property	No	0
State Comprehensive Environmental Response, Compensation, and Liability Act of 1980 Uncontrolled Sites (CERCLAUS) list	1 mile	No	0
State Landfill or Solid Waste Disposal Sites	½ mile	No	0
Leaking Underground Storage Tanks	½ mile	No	13
Registered Underground Storage Tanks	¼ mile	Yes	13
State Institutional Control/Engineering Control Registry	½ mile	No	0
State Voluntary Evaluation Program (VEP) database	½ mile	No	0
State Brownfield (BF) sites	½ mile	No	0
State Closed Landfill and Solid Waste Disposal Sites (CLFSWDS)	½ mile	No	0
State Landfill and Solid Waste Disposal Sites (ALFSWDS)	½ miles	No	0

Thirty-seven (37) sites were identified during the database search within a ½ mile radius of the target area, including the Subject Property. Several of the listed facilities represent a REC due to distance, anticipated direction of groundwater flow, and/or anticipated risk of contamination. Further details regarding these properties listed on the GeoSearch database that are within a ¼ mile of the subject property are provided below. Fewer than forty-three sites are listed because a location may appear on more than one environmental database.

- **Greenville Buick/CAD/Pontiac/GMC**

Location: 522 Washington Avenue
Subject Site

Summary: According to the GeoSearch database records, the former Greenville Buick/CAD/Pontiac/GMC automotive dealership, located at 522 Washington Avenue, is listed on the Facility Registry System (FRS) as well as the Registered Underground Storage Tank (RUST) database. The FRS is an EPA database that identified facilities or sites of potential environmental interest. Likely this facility is listed on the FRS due to it being listed on the RUST database.

The property partly operated as an automotive servicing station, and contained one 800-gallon capacity gasoline Underground Storage Tank (UST) (installed in 1973), and one 400-gallon capacity gasoline UST (installed in 1958). Both tanks were listed as closed in December 15, 1988. According to the report, both tanks were listed as permanently out of service; however, were not listed as removed from the ground. The potential for these USTs to still be present at the Subject

Property exists and poses as a REC to the soil and/or groundwater quality of the Subject Property.

- **The Filling Station #44:**

Location: 202 North Broadway
Approximately 300 feet northeast

Summary: The Filling Station #44 facility, located approximately 300 feet northeast and topographically crossgradient of the Subject Property at 202 North Broadway, is listed on the GeoSearch database as a Leaking Underground Storage Tank (LUST) and RUST facility. According to the MDEQ UST database, the site contained two 8,000-gallon capacity gasoline USTs and one 4,000-gallon capacity UST, each installed on 1/1/1985. Additionally, a 560-gallon capacity used-oil UST was installed at an unknown date. All four tanks were listed as out-of-use on 11/1/1997 and the facility as noted during Cardno's site reconnaissance as razed. According to the report, the facility contained two separate leak events (#1 & 2) and identified as Incident ID #: 11648LST. These incidents occurred in 1999 and 2010, respectively. Cardno attempted to gather additional information from MDEQ in respect to these incidents, but have been unable to obtain this information.

According to the GeoSearch report, both releases have been closed and provided a no further action status determination. Given its regulatory status, distance, and the intervening topographic gradient, this facility is not considered to have the potential to have impacted the soil, groundwater, and/or vapor at the Subject Site.

- **Gresham Service Station #6:**

Location: 605 West Alexander Street
Approximately 400 feet east-northeast

Summary: The Gresham Service Station #6, located approximately 400 feet east-northeast and topographically crossgradient of the Subject Property at 605 West Alexander Street, is listed on GeoSearch database as a RUST and LUST facility. According to the MDEQ UST database, the facility contained two 12,000-gallon capacity gasoline USTs, one 10,000-gallon capacity gasoline UST, and one 6,000-gallon capacity gasoline UST – all of which were removed on January 8, 1990 and replaced with three 10,000-gallon capacity gasoline USTs. A leaking tank was reported on January 8, 1990 (ID# 8240LST), during the tank removal process. Cardno attempted to gather additional information from MDEQ in respect to these incidents but has been unable to obtain this information. According to the GeoSearch report, this release was been closed and provided a no further action status determination in July 1991. Given its regulatory status, distance, and the intervening topographic gradient, this facility is not considered to have the potential to have impacted the soil, groundwater, and/or vapor at the Subject Site.

- **FINA Super Service – Richards Service Center**

Location: 604 Main Street
Approximately 700 feet south

Summary: The FINA Super Service facility, located approximately 700 feet south and topographically downgradient from the Subject Property at 604 Main Street, is listed on the GeoSearch database as a RUST facility. The property operated as a gasoline service station between 1988 and 2010, with two 3,000-gallon capacity gasoline USTs, one 1,000-gallon capacity gasoline UST, and one 4,000-gallon capacity gasoline UST. According to the Mississippi Department of Environmental Quality (MDEQ) UST database, three of the above-mentioned tanks have been removed from the ground. The fourth tank, reportedly last used in 2010 is listed as permanently closed. There are no reported leaks at this facility. Based on the distance from the site, and lack of reported releases, this facility is not considered to have the potential to have impacted the soil, vapor, and/or groundwater at the Subject Site.

- **Buddy's Texaco:**

Location: 531 Main Street
Approximately 700 feet south

Summary: The Buddy's Texaco facility, located approximately 700 feet south and topographically downgradient of the Subject Property at 531 Main Street, is listed on the GeoSearch database as a LUST and RUST facility. According to the MDEQ UST database, this site contained one 550-gallon capacity used-oil UST, one 2,000-gallon capacity gasoline UST, one 3,000-gallon capacity UST, and one 4,000-gallon capacity UST. All of the above-mentioned USTs were reportedly removed in June 27, 1995. A leak was reported at this facility on July 24, 1995 (Incident ID# 115482ST). Cardno attempted to gather additional information from MDEQ in respect to these incidents, but has been unable to obtain this information. According to the GeoSearch report, this release was been closed and provided a no further action status determination in November 1998. Given its regulatory status, distance, and the intervening topographic gradient, this facility is not considered to have the potential to have impacted the soil, groundwater, and/or vapor at the Subject Site.

- **Double Quick #81:**

Location: 229 South Broadway
Approximately 0.2 miles south

Summary: The Double Quick #81 facility, located approximately 0.2 miles south and topographically downgradient of the Subject Property at 229 South Broadway, is listed on the GeoSearch database as a LUST and RUST facility. According to the MDEQ UST database, the site contained one 10,000 gasoline, and two 8,000 gasoline USTs which were removed from the ground in November 1996 and replaced with two 10,000-gallon gasoline USTs currently still in use. According to the report, the facility contained two release events, one in 1989 and the other in 2016. Cardno attempted to gather additional information from

MDEQ in respect to these incidents, but have been unable to obtain this information.

According to the GeoSearch report, both releases have been closed and provided a no further action status determination, with the latest issued in February 2018. Given its regulatory status, distance, and the intervening topographic gradient, this facility is not considered to have the potential to have impacted the soil, groundwater, and/or vapor at the Subject Site.

The remaining listing facilities were located greater than 0.2 miles and based on intervening topography, distance, and regulatory status are not considered to have the potential to have impacted the soil, groundwater, and/or vapor at the Subject Site.

5.2 Physical Setting Sources

A GeoSearch Physical Setting Map report is included in **Appendix D**. According to this report, surficial sediments at the site are underlain by alluvium loam only identified along the Mississippi River Alluvial Plain.

The 2012 USGS 7.5-minute series topographic map of Greenville, Mississippi quadrangle shows the property is relatively flat, with slight slopes to the east towards the adjacent canal, with the central portion of the site flat. Likely the central portion of the site was graded during the construction of the existing building. Topography ranges from approximately 125 to 135 feet above mean sea level (MSL). Based on map topography contours, the inferred primary direction of groundwater flow for the vicinity of the subject site is determined to be generally northwest towards the nearby Mississippi River. A USGS Topographic Map is included in **Figure 1**.

A copy of the soil survey inquiry results obtained via the web-based USDA National Resources Conservation Survey is included as **Appendix D**. According to the US Department of Agriculture Natural Resources Conservation Service inquiry, the site is situated in an area primarily comprised of the following soil type:

- **Sharkey Clay Series:** 0-5% slopes; predominantly forms from clayey alluviums along back-swamps and flood plains (The Mississippi delta region) and consists of very deep, very poorly drained soils, and typically exhibits a low hydraulic conductivity.

5.3 Historical Records Sources

5.3.1 Aerial Photographs, Topographic Maps, and Sanborn Maps

The objective of consulting historical sources is to determine the likelihood of past uses having led to recognized environmental conditions in connection with the property. A review was conducted of historical aerial photographs (**Appendix E**) and Topographic Maps (**Appendix F**) obtained from GeoSearch. For ease of review, **Figures 4a-4s** are also provided to show the approximate property boundary on a representative selection of these historical aerial photos.

Sanborn Fire Insurance Maps have been produced since the late 1800's to provide information relative to fire hazards on insurable property. These maps often indicate locations of underground and aboveground gasoline tanks, storage facilities for flammable chemicals, such as dry cleaners, paint shops, maintenance and garage facilities, as well as historical information on occupants of buildings, unavailable through other sources. Production of these maps typically was limited to the immediate

vicinity of downtown urban areas. The Subject Property was identified in several Sanborn maps, created between 1881 and 1950 and is included as **Appendix H**. For ease of review, **Figure 5a-5j** shows the approximate property boundaries on the provided Sanborn maps.

Findings of the historical aerial photos, topographic maps, and Sanborn fire insurance maps are chronologically summarized in the following table:

Period	Source(s)	<u>Identified Historical Uses</u>		Comments
		Subject Property	Surrounding Area	
1881	Sanborn Fire Insurance Map	Primarily developed with nine separate structures, including three dwellings.	Interspersed residential listings and a church observed to the northeast.	No RECs noted.
1896	Sanborn Fire Insurance Map	Developed with four dwelling and associated outhouses.	Similar to previous Sanborn map.	No RECs noted.
1900	Sanborn Fire Insurance Map	Similar to previous Sanborn map.	Additional residential development is noted to the north and west, adjacent to the Subject Property.	No RECs noted.
1905	Sanborn Fire Insurance Map	Similar to previous Sanborn map.	Additional residential development is noted to the north and west, adjacent to the Subject Property.	No RECs noted.
1911	Sanborn Fire Insurance Map	The Elks and Olympia Clubs are observed along the southern portions of the map, located at 504 & 508 Washington Avenue. Seven additional, unidentifiable structures are noted throughout the Subject Property.	Similar to previous Sanborn map.	No RECs noted.
1915	Sanborn Fire Insurance Map	Similar to previous Sanborn map.	Similar to previous Sanborn map.	No RECs noted.
1925	Sanborn Fire Insurance Map	Similar to previous Sanborn map.	Similar to previous Sanborn map.	No RECs noted.
1931	Sanborn Fire Insurance Map	The former Greenville Buick/CAD/Pontiac/GMC automotive dealership, located at 522 Washington Avenue is observed along the southern portion of the Subject Property. The AON washing and greasing facility is observed north of the dealership, along Sunflower Lane.	Similar to previous Sanborn map with increased surrounding commercial and residential development.	The former Greenville Buick/CAD/Pontiac/GMC automotive dealership contains associated maintenance and servicing depts. that are a potential REC. The AON automotive washing and greasing facility is a potential REC. (REC #1)
1938	Aerial Photograph (Figure 4a)	Primarily commercial development.	Primarily commercial & residential development.	No RECs noted.
1943	Aerial Photograph (Figure 4b)	The Greenville Buick/CAD/Pontiac/GMC automotive dealership is observed along the southern portion of the Subject Property.	An increase in commercial development is observed throughout the surrounding area.	Historic UST and automotive servicing practices associated with the Greenville Buick/CAD/Pontiac/GMC automotive dealership is a potential REC. (REC #1)

Period	Source(s)	<u>Identified Historical Uses</u>		Comments
		Subject Property	Surrounding Area	
1949	Aerial Photograph (Figure 4c)	Too blurry for accurate review.	Too blurry for accurate review.	No additional RECs noted.
1950	Sanborn Fire Insurance Map	The Olympia Club is now observed as the Cadet Club, at 508 Washington Avenue. The on-site automotive dealership is observed to contain a washing & greasing center and a body repair / spray painting garage, to the north along Sunflower Lane. An additional automotive storage building is observed along the northern boundary of the Subject Property. Furthermore, a gasoline filling station is observed to the southeast, near the corner of Washington Avenue and Broadway Street. Apartments are observed along the western boundary.	Similar to previous Sanborn map with increased surrounding commercial and residential development.	The Body repair / automotive spray painting facility observed along Sunflower Lane is a potential REC. The automotive storage facility observed along the northern boundary of the Subject Property, along Sunflower Lane is a potential REC. (REC #1) The filling station , observed at corner of Broadway Street and Washington Avenue is a potential REC. (REC #3)
1957	Aerial Photographs (Figure 4d)	Too blurry for accurate review.	Too blurry for accurate review.	No RECs noted.
1968	Sanborn Fire Insurance Map	New Auto warehouse facility is observed along the northern boundary of the Subject Property.	Similar to previous Sanborn maps.	New Auto warehouse facility at 522 Washington Avenue is a potential REC. (REC #1)
1970	Topographic Map	Subject Property is shaded red – indicating developed land. The topography of the Subject Property and surrounding is predominantly flat, with little to no elevation changes within a ¼ miles radius.	Urban land surrounding the Subject Property.	No RECs noted.
1972	Topographic Map	Similar to previous topographic map.	Increased development observed throughout the surrounding area.	No RECs noted.
1967	Aerial Photograph (Figure 4e)	The Subject Property is predominantly developed along the south and eastern portions. The Guaranty Bank, Elks Lodge, Greenville automotive dealership, and an automotive service center are observed.	Similar to previous aerial photograph, but with additional single-family residences to the southeast.	Automotive service center is a potential REC. (REC #1)
1974	Aerial Photograph (Figure 4f)	Similar to the previous aerial photograph.	Similar to the previous aerial photograph.	No additional RECs noted.
1984	Aerial Photograph (Figure 4g)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.

Period	Source(s)	<u>Identified Historical Uses</u>		Comments
		Subject Property	Surrounding Area	
1992	Aerial Photograph (Figure 4h)	Too blurry for accurate review.	Too blurry for accurate review.	No additional RECs noted.
1996	Aerial Photograph (Figure 4i)	Structures previously observed near the center of the Subject Property, along Sunflower Drive are no longer depicted. Majority of the Subject Property is observed as concrete-paved land.	Similar to previous aerial photographs.	No additional RECs noted.
2001	Aerial Photograph (Figure 4j)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2004	Aerial Photograph (Figure 4k)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2005	Aerial Photograph (Figure 4l)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted..
2006	Aerial Photograph (Figure 4m)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2007	Aerial Photograph (Figure 4n)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2009	Aerial Photograph (Figure 4o)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2010	Aerial Photograph (Figure 4p)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2012	Topographic Map	Subject Property is depicted as urban, developed land.	Similar to previous topographic map.	No RECs noted.
2012	Aerial Photograph (Figure 4q)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2014	Aerial Photograph (Figure 4r)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.
2016	Aerial Photograph (Figure 4s)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No additional RECs noted.

The Subject Site was identified as an auto dealership and maintenance facility since the late 1920s until the 1980s. Identified facilities include an auto body repair, spray painting, and a washing and degreasing buildings. Based on the historic usage and likely chemical handling of these facilities, Cardno considers these facilities to be a REC in connection with the Subject Property.

A gasoline service station, identified in the 1931 and 1950 Sanborn maps, is depicted on the northwest corner of Washington Avenue and North Broadway Street, at the current location of the Guaranty Bank & Trust building. Cardno was unable to identify reportable documents within the MDEQ database in relation to this facility, likely due to the age of the facility. This facility was razed for the construction of the Washington County Savings and Loan building, and later on, the Guaranty Bank & Trust building currently utilized on the Subject Property. Given the lack of documentation for this facility, position on the Subject Property, and historical use as a filling station, Cardno considers this on-site facility to be a REC in connection with the Subject Property.

5.3.2 City Directories

Historical City directories are referenced for study areas which help identify changes in land use based on the type of businesses that occupied the Subject Property and surrounding area. The type of business, such as automotive, dry cleaning, gasoline/service stations, etc. are indicative of the possible presence of hazardous substances or petroleum products. Historical use information describing the Subject Site and nearby properties was obtained from GeoSearch from 1927 to 2016. The detailed GeoSearch City Directory report is included in **Appendix G**.

A city directory search was conducted along Washington Avenue, which extends along the southern boundary of the Subject Property, as well as along Sunflower Lane, which divides the Subject Property in-half, between North Hines Street and Broadway Street. Majority of the findings observed along Subject Property contained Washington Avenue addresses (odd addresses were observed along the southern side of Washington Avenue).

The Subject was identified as an assemblage of properties observed on the city directories. However, according to the observed city directories, the properties identified within the Subject Property have addresses between 500 and 541 Washington Avenue.

Findings of the city directories are chronologically summarized in the following table:

Period	<u>Identified Historical Uses</u>		Comments
	Subject Property	Surrounding Area	
1927 -1928	500 Washington Avenue: Elk Home 504 Washington Avenue: Olympia Club 505 Washington Avenue: Residential 536 Washington Avenue: Residential	501 Washington Avenue: Residential 503 Washington Avenue: Residential 539 Washington Avenue: The Apple House 541 Washington Avenue: Central Drug Co. / People's Theatre, Rae's Shop Beauty Parlor Sunflower Lane: various residents	No RECs noted.
1929-1930	500 Washington Avenue: Elk Home 504 Washington Avenue: Olympia Club 510-512 Washington Avenue: Greenville Buick Co. 536 Washington Avenue: Residential	501 Washington Avenue: Residential 503 Washington Avenue: Residential 505 Washington Avenue: Residential 539 Washington Avenue: Seanger Theatre 541 Washington Avenue: Marion Parior / Life and Casualty Insurance Co. of Tennessee / Rae's Marinello Shoppe Beauty Parlor / Saenger Theatre Sunflower Lane: various residents	Greenville Buick-Pontiac Co. (REC #1)
1936	500 Washington Avenue: Elks Home 504 Washington Avenue: Olympia Club 508 Washington Avenue: Greenville Buick Co. 540 Washington Avenue: Equitable Life Insurance Society / National Burial Association / Ries W. J. Dentistry / Wade Mary Business College	417 Washington Avenue: Gulf Service Station 501 Washington Avenue: Residential 503 Washington Avenue: Residential 507 Washington Avenue: Reid Bros. Grocery 539 Washington Avenue: Greenville Farm Loan Sunflower Lane: various residents	Greenville Buick-Pontiac Co. (REC #1) Gulf Service station potential REC

Period	<u>Identified Historical Uses</u>		Comments
	Subject Property	Surrounding Area	
1940	500 Washington Avenue: Delta Theatre 508 – 510 & 537 Washington Avenue: Greenville Buick Co. 539 Washington Avenue: Roslyn Electric Co. 541 Washington Avenue: National Burial Association / Industrial Life and Health Insurance Co. / Paramount Theatre / Marion Parlor / Studio of Beauty / Summerlin Shell Service Station	419 Washington Avenue: Delta Theatre 501 Washington Avenue: Residential 503 Washington Avenue: Residential 505 – 507 Washington Avenue: Reid Brothers Grocery Sunflower Lane: various residents	Summerlin Shell Service Station (REC #3) Greenville Buick-Pontiac Co. (REC #1)
1946	500 Washington Avenue: BPOE No. 148 / Soldiers Recreation Center 508 – 510 & 537 Washington Avenue: Greenville Buick Co. / US War Price and Rationing BD 514 Washington Avenue: Capitol Bus Lines / Delta Trans. Co. / Tri-State Bus Station / Tri-State Transit Co. 541 Washington Avenue: Paramount Theatre	419 Washington Avenue: Delta Theatre 501 Washington Avenue: Residential 503 Washington Avenue: Residential 505 – 507 Washington Avenue: Reid Brothers Grocery 519 Washington Avenue: Delta Optical Service / Greenville Eat Shop 539 Washington Avenue: Roslyn Electric Co.	Greenville Buick-Pontiac Co. (REC #1)
1950-1951	504 Washington Avenue: Chamber of Commerce / Delta Fair and Livestock Show / Elk Club / Greenville Community Fund 514 Washington Avenue: YMHA Club 522 Washington Avenue: Greenville Buick-Pontiac Co. 527 Washington Avenue: Delta Optical Service 536 Washington Avenue: Summerlin Service Station	423 Washington Avenue: Moss Gulf Service Station 503 Washington Avenue: Residential 517 Washington Avenue: Sears Roebuck and Co. 525 Washington Avenue: Tatum Furn and Mus. Co. 535 Washington Avenue: Paramount	Summerlin Shell Service Station (REC #3) Greenville Buick-Pontiac Co. (REC #1) Off-site gas station potential REC
1956	504 Washington Avenue: Elks Club 514 Washington Avenue: YMHA Club 522 Washington Avenue: Greenville Buick-Pontiac Co. 525 Washington Avenue: Tatum Furn and Mus. Co. 536 Washington Avenue: Summerlin Service Station	503 Washington Avenue: Residential 509 - 511 Washington Avenue: Kress S H & Co. 527 Washington Avenue: Vacant 535 Washington Avenue: Paramount	No additional RECs noted.
1960	504 Washington Avenue: Elks Club 514 Washington Avenue: YMHA Club 522 - 526 Washington Avenue: Greenville Buick-Pontiac Co. 525 Washington Avenue: Tatum Furn and Mus. Co. 536 Washington Avenue: Summerlin Service Station	423-425 Washington Avenue: Penney J C Co. Inc. 421 Washington Avenue: Bell Bros. Shoes 424 Washington Avenue: Tompsons Gulf Service 503 Washington Avenue: Residential 509 - 511 Washington Avenue: Kress S H & Co. 517 Washington Avenue: Allstate Insurance Co. / Sears Roebuck and Co. 527-529 Washington Avenue: Ben Franklin Store 535 Washington Avenue: Paramount	Summerlin Shell Service Station (REC #3) Greenville Buick-Pontiac Co. (REC #1) Off-site gas station potential REC

Period	<u>Identified Historical Uses</u>		Comments
	Subject Property	Surrounding Area	
1961	504 Washington Avenue: Elks Club 514 Washington Avenue: YMHA Club 522 - 526 Washington Avenue: Greenville Buick-Pontiac Co. 536 Washington Avenue: Summerlin Service Station	423-425 Washington Avenue: Penney J C Co. Inc. 421 Washington Avenue: Bell Bros. Shoes 424 Washington Avenue: Tompsons Gulf Service 503 Washington Avenue: Residential 509 - 511 Washington Avenue: Kress S H & Co. 517 Washington Avenue: Allstate Insurance Co. / Sears Roebuck and Co. 525 Washington Avenue: Tatum Furn and Mus. Co. 527-529 Washington Avenue: Ben Franklin Store 535 Washington Avenue: Paramount theatre	No additional RECs noted.
1965	504 Washington Avenue: Levy & Rode Ltd. Furniture 508 Washington Avenue: Kossman State Agency 514 Washington Avenue: YMHA Club 522 - 526 Washington Avenue: Greenville Buick-Pontiac Co. 525 Washington Avenue: Tatum Furn and Mus. Co. 536 Washington Avenue: Washington County Savings and Loan Assn.	423-425 Washington Avenue: Penney J C Co. Inc. 421 Washington Avenue: Bell Bros. Shoes 424 Washington Avenue: Tompsons Gulf Service 503 Washington Avenue: Residential 509 - 511 Washington Avenue: Kress S H & Co. 517 Washington Avenue: Allstate Insurance Co. / Sears Roebuck and Co. 527-529 Washington Avenue: Ben Franklin Store 535 Washington Avenue: Paramount theatre 539 Washington Avenue: Marion Parlor	Greenville Buick-Pontiac Co. (REC #1) Off-site gas station potential REC
1970	504 Washington Avenue: Delta Bodies 508 Washington Avenue: Indiana Lumbermen Mutual Insurance Co. 514 Washington Avenue: Vacant. 522 Washington Avenue: Greenville Buick-Pontiac Co. 536 Washington Avenue: Washington County Savings and Loan Assn.	423 Washington Avenue: Penney J C Co. Inc. 424 Washington Avenue: Planters Bank & Trust 503 Washington Avenue: Residential 509 Washington Avenue: Kress S H & Co. 517 Washington Avenue: Allstate Insurance Co. / Sears Roebuck and Co. 525 Washington Avenue: Tatum Furn and Mus. Co. 527-529 Washington Avenue: Ben Franklin Store 535 Washington Avenue: Paramount theatre 539 Washington Avenue: Marion Parlor	Greenville Buick-Pontiac Co. (REC #1)
1976	504 Washington Avenue: Delta Bodies / Greenville Lodge No. 206 508 Washington Avenue: Indiana Lumbermen Mutual Insurance Co. 514 Washington Avenue: Vacant. 522 Washington Avenue: Greenville Buick-Pontiac Co. 536 Washington Avenue: Washington County Savings and Loan Assn.	423 Washington Avenue: Penney J C Co. Inc. 424 Washington Avenue: Planters Bank & Trust 501 Washington Avenue: Vacant 509 Washington Avenue: Kress S H & Co. 517 Washington Avenue: Allstate Insurance Co. / Sears Roebuck and Co. 525 Washington Avenue: Tatum Furn and Mus. Co. 527-529 Washington Avenue: Ben Franklin Store 535 Washington Avenue: Paramount theatre	No additional RECs noted.

Period	<u>Identified Historical Uses</u>		Comments
	Subject Property	Surrounding Area	
1980	504 Washington Avenue: Mississippi Action Community Education Program 508 Washington Avenue: Indiana Lumbermen Mutual Insurance Co. / Kossman Insurance 522 - 525 Washington Avenue: Greenville Buick-Pontiac Co. 536 Washington Avenue: Washington County Savings and Loan Assn.	423 Washington Avenue: Athletic's Club 424 Washington Avenue: Planters Bank & Trust Co. 501 Washington Avenue: Witherbee House Historical Restoration 509 Washington Avenue: Kress S H & Co. 517 Washington Avenue: Fine Vines Blue Jean 527- 529 Washington Avenue: Vacant	No additional RECs noted.
1985	504 Washington Avenue: Mississippi Action Community Education Program 508 Washington Avenue: Kossman Insurance 522 - 525 Washington Avenue: Greenville Buick-Pontiac Co. 536 Washington Avenue: Magnolia Federal Bank	424 Washington Avenue: Planters Bank & Trust Co. 501 Washington Avenue: Witherbee House Historical Restoration 509 Washington Avenue: Factory Furniture 517 Washington Avenue: Fine Vines Blue Jean 527- 529 Washington Avenue: Vacant	No additional RECs noted.
1990	504 Washington Avenue: Vacant 508 Washington Avenue: Kossman-Young Insurance 522 Washington Avenue: Vacant 536 Washington Avenue: Magnolia Federal Bank	423 Washington Avenue: Higher Dimensions Church 424 Washington Avenue: Planters Bank & Trust 501 Washington Avenue: Witherbee House Historical Restoration 509 Washington Avenue: Perry's Pawn Shop and Trading Post 517 Washington Avenue: Fine Vines 525 Washington Avenue: Rapid Finance Co	No RECs Noted.
1996	504-509 Washington Avenue: Vacant (2 houses) 522 - 525 Washington Avenue: Vacant 536 Washington Avenue: Magnolia Federal Bank	423 Washington Avenue: Higher Dimensions Church 424 Washington Avenue: Planters Bank & Trust 501 Washington Avenue: Witherbee House Historical Restoration 517 Washington Avenue: Fine Vines	No RECs Noted.
2000	508 Washington Avenue: Alber J. Kossman Residence 522 Washington Avenue: Cato Charles Residence 536 Washington Avenue: Magnolia Federal Bank	423 Washington Avenue: Higher Dimensions Church 424 Washington Avenue: Planters Bank & Trust 503 Washington Avenue: Witherbee House Historical Restoration	No RECs Noted.
2003	522 Washington Avenue: Cato Charles Residence 536 Washington Avenue: Guaranty Bank & Trust Co.	423 Washington Avenue: Higher Dimensions Church 424 Washington Avenue: Planters Bank & Trust 440 Washington Avenue: Madison Gail A. Residence 503 Washington Avenue: Greenville Arts Council	No RECs Noted.
2009	522 Washington Avenue: Stephen A. Giachelli Residence 536 Washington Avenue: Guaranty Bank & Trust Co.	423 Washington Avenue: Higher Dimensions Church 424 Washington Avenue: Planters Bank & Trust 503 Washington Avenue: Greater Greenville Housing	No RECs Noted.

Period	<u>Identified Historical Uses</u>		Comments
	Subject Property	Surrounding Area	
2016	536 Washington Avenue: Guaranty Bank & Trust Co.	417 Washington Avenue: Delta Teaching Supply 503 Washington Avenue: Greater Greenville Housing	No RECs Noted.

Three off-site gasoline service stations were identified within specified search distances along Washington Avenue in the City directories between the years of 1936 and 1965.

1. The Gulf Service Station, formerly located at 417 Washington Avenue approximately 250 feet west and topographically downgradient, was identified in the 1936 city directory. This facility is inferred to be a gasoline service station; however based on UST records provided by MDEQ, there are not records of any historical USTs at this address.
2. The Moss Gulf Service Station, formerly located at 423 Washington Avenue approximately 225 feet west and topographically downgradient, was identified in the city directories between 1950 and 1951. This facility is inferred to be a gasoline service station; however based on UST records provided by MDEQ, there are not records of any historical USTs at this address. The facility is inferred to be in correlation with the Gulf Service station at 417 Washington Avenue, originally identified on the 1936 city directory.
3. The Thompson Gulf Service Station, formerly located at 424 Washington Avenue approximately 225 feet west and topographically downgradient, was identified in the city directories between the years of 1960 and 1965. This facility is inferred to be a gasoline service station; however based on UST records provided by MDEQ, there are no records of any historical USTs at this address. The facility is inferred to be in correlation with the Gulf Service station at 417 and 423 Washington Avenue, identified in the 1936 and 1950/1951 city directories.

Based on the absence of reported releases, distance from the subject site, and intervening topographic gradient, Cardno considers these off-site gasoline services stations to not have the potential to have an impact to the soil, groundwater, and/or vapor of the Subject Site.

As noted above, a gas station (Summerlin Shell Service Station) was identified in the historical city directories between the years of 1940 and 1961. This facility is located on-site at 536 Washington Avenue, located at the northwest intersection of North Broadway and Washington Avenue. This facility was razed for the construction of the Washington County Savings and Loan building, and later on, the Guaranty Bank & Trust building currently utilized on the Subject Property. Given the lack of documentation for this facility, position on the Subject Property and historical presence, Cardno considers this on-site facility to be a REC in connection with the Subject Property.

As noted above, the Greenville Buick/Pontiac automotive servicing and dealership was identified in the city directories between the years of 1929 and 1985. This facility, in conjunction with review of Sanborn Maps outlined earlier in Section 5.3, was observed to have multiple automotive servicing and maintenance facilities. Given the its historical automotive practices, and likely historical presence of fuels, oils, and other chemicals, this facility is considered a REC in connection with the Subject Property.

5.3.3 Prior Reports

Cardno completed an Asbestos Survey and Lead-Based Paint Survey of the Old Elks Club located at 504 Washington Avenue. The surveys were conducted by Vance Nimrod, P.E., a licensed asbestos

and lead-based paint inspector, on behalf of Cardno and completed on October 5, 2018. Mr. Nimrod completed the inspections in September 2018, and surveyed the entirety of the building, with the exception of areas within the third floor and the roof, which were inaccessible due to the building's deteriorating condition.

The asbestos survey identified the following asbestos containing materials:

- Various floor tiles and underlying mastic located throughout
- Texturing on walling and ceiling located throughout
- Drywall / joint compound walling and ceiling located throughout

Cardno concluded that the material should be abated by a licensed abatement contractor prior to disturbance during renovation or demolition. It is further detailed that options to remove the material include removing the individual materials, or, considering the building's condition, demolishing the whole building and treat all debris as asbestos containing.

The lead-based paint survey identified the following lead containing painted surfaces:

- Orange paint on wood trim located in the first floor hallway
- White paint on ceiling trim located on the first floor hallway and second floor
- Green paint on first floor back wall
- Yellow paint on 2nd floor bathroom
- Orange paint on third floor north wall

Cardno concluded that these materials be disclosed to any potential building contractors prior to renovation or demolition to ensure adequate safety measures are taken. In addition, it is recommended that any building debris should be analyzed for lead via toxicity characteristic leachate procedure (TCLP) to determine its waste characterization for disposal purposes prior to its removal.

Copies of these reports are included in **Appendix I**.

No other prior reports were provided or identified by Cardno during this investigation.

6 Site Reconnaissance

The following is a summary of visual and/or physical observations of the property noted during Cardno's visits to the site on September 20th and 21st, 2018. Representative photographs can be found in **Appendix A**.

6.1 Methodology and Limiting Conditions

Douglas Strait, P.E., a Project Manager with Cardno, conducted the site reconnaissance on September 20th and 21st, 2018. The site reconnaissance consisted of visual and/or physical observations of the property and improvements; adjoining sites as viewed from the property; and, the surrounding area based on visual observations made during the trip to and from the property.

Multiple limitations were identified during Cardno's site reconnaissance, including:

- Access was not granted by their respective owners for Cardno to access to interior of structures associated with the Greenville Buick/Pontiac automotive dealership located at 522 Washington Avenue, and the two formerly-associated automotive storage structures located near the northeastern portion of the Subject Property. Exterior photographs were taken along these parcel's boundaries during Cardno's site reconnaissance, including within windows of the existing buildings. Based on the inability to examine the interior of these structure, this limitation is considered a data gap, hindering Cardno's ability to properly examine and identify potential RECs in connection with the Subject Property.
- Access was not granted by representatives of Guaranty Bank for Cardno to enter secure areas of the Guaranty Bank & Trust building located at 536 Washington Avenue. This limitation included access to vault spaces, security rooms, and other sensitive areas. Cardno does not consider this limitation to be a significant data gap and does not believe it hindered Cardno's ability to properly examine and identify potential RECs in connection with the Subject Property.
- Some areas within the former Elks Lodge, located at 504 Washington Avenue were inaccessible due deteriorations of the building's structural integrity. These damages were mostly caused by water leaks and the degradation of stairways. Although this is considered a data gap, Cardno believes this data gap does not affect the ability to identify RECs.

With exception to the aforementioned limitations, all other reasonably-accessible exterior and interior portions of the subject Property were observed during this assessment.

6.2 Hazardous Substance Use, Storage, and Disposal

One 55-gallon metal drum of hydraulic fluid for the elevator was identified in the third floor of the Guaranty Bank & Trust building. The drum appeared to be in good condition, and was properly labeled with no evidence of staining or releases. Based on the on-site condition, this drum is considered a de minimus condition.

Cardno did not observe the use, storage, or disposal of any other hazardous substances, including hazardous wastes on the property.

6.3 Underground Storage Tanks (USTs)

Cardno observed a potential vent pipe, inferred to be associated with suspected USTs, along the northern exterior wall of the north building associated with the former Greenville Buick/Pontiac

dealership, located at 522 Washington Avenue. These USTs are registered in the MDEQ UST database as Tank ID#: 1205. According to their records, these USTs are permanently out of use, and were closed on December 15, 1988. However, their records do not indicate whether these tanks were removed from the ground. Therefore, the suspected USTs are considered a REC in connection with the Subject Property. Additional details can be found in Sections 5.1 and 8, as well as a photograph of the ventilation pipe in **Appendix A**.

6.4 Aboveground Storage Tanks (ASTs)

Cardno did not observe any ASTs on the subject site.

6.5 Other Petroleum Products

Cardno did not observe any additional evidence of other petroleum products. As mentioned above, Cardno did observe evidence of a UST near the center of the Subject Property.

6.6 Polychlorinated Biphenyls (PCBs)

Cardno observed several pole-mounted transformers on power poles near the southeastern portions of the Subject Property. These transformers appeared to be in good condition with no evidence of releases. The PCB status of these transformers is unknown.

According to interviews, in-ground lifts were noted within the interior of the former Greenville Buick/Pontiac dealership, located at 522 Washington Avenue. These lifts were not observed during the site reconnaissance; however, they were reportedly in the south building. The hydraulic fluid of any on-site lifts potentially contain PCBs.

6.7 Unidentified Substance Containers

Cardno observed no unidentified substance containers on the Subject Property.

6.8 Nonhazardous Solid Waste

Cardno observed several piles of building and tree debris around the former Greenville Buick/Pontiac dealership building's footprint. No evidence of hazardous waste or unidentified containers were identified in any of the debris. No dumpsters or other solid waste accumulation was observed on the Subject Site.

6.9 Wastewater

According to interviews, the entire site is supplied by sanitary sewerage through the local municipality. Wastewater sources currently and historically were generated through the bathrooms and sinks throughout the buildings.

6.10 Waste Pits, Ponds and Lagoons

Cardno did not observe evidence of ponds, waste pits, or lagoons on the subject site.

6.11 Drains and Sumps

Cardno did not observe evidence of any drains or sumps in, on, or at the subject site.

6.12 Septic Systems

Cardno did not observe evidence of septic tank usage at the subject site.

6.13 Storm Water Management System

With the exception of one culvert along Washington Avenue and one along N. Broadway Street, Cardno did not observe any active storm water management systems on the Subject Property.

6.14 Wells

Cardno did not observe any monitoring wells or active drinking wells on the subject property.

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7 Subsurface Vapor Migration

Hazardous gases (vapor) from subsurface sources, such as contaminated soil or groundwater can migrate into residential, commercial, and industrial buildings with any foundation type, including basements, crawlspaces, or slabs. According to EPA guidance, three conditions must exist for hazardous vapors to reach the interior of buildings from the subsurface environment underneath or near a building. First, a source of hazardous vapors must be present in the soil or in groundwater underneath or near a building. Second, vapors must form and have a pathway along which to migrate toward the building. Third, entry routes must exist for the vapors to enter the building, and driving forces must exist to draw the vapors into the building.

Cardno considered the nature and extent of on-site and nearby sources of potential subsurface vapor migration by evaluating the current and historical usage of the property, the construction type and history, the physical setting, and the potential sources of subsurface vapor migration through the review of regulatory agency database information that was summarized in Section 5.0.

Based on the evaluation of the known or suspected releases of hazardous substances or petroleum products, their distance from the property, potential pathways separated by roads with underground utilities, and soil type, et al, the subject sites is a potential subsurface vapor migration sources for the following:

- On-site automotive maintenance and servicing facilities
- Possible contamination from historic underground storage tanks

No other potential subsurface vapor migration sources were determined to represent a recognized environmental condition.

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8 Interviews

Cardno completed an interview questionnaire from an interview with the following people:

- Ms. Amelia Wicks, Representative of current owner and End User, City of Greenville
 - Ms. Amelia Wicks stated that she has no knowledge of any environmental cleanups, hazardous spills and/or releases, or any other obvious indicators of contamination in connection with the Subject Property.
- Mr. Boykin, current owner of the vacant paved lot northeast of 504 Washington Avenue
 - Mr. Bill Boykin stated he has owned the lot since 2012. To his knowledge, the property has only been a cleared, concrete-paved parking lot since its development. He stated that he is unsure whether the property is connected to water/sewage and/or electric utilities. Furthermore, Mr. Boykin stated he has not witnessed any, or does have knowledge of any environmental cleanups, hazardous spills and/or releases, or any other obvious indicators of contamination within his lot, or within the Subject Property.
- Mr. Carl Cottingham, former owner of the Buick/Pontiac automotive dealership and vacant lots
 - According to Mr. Cottingham, his family has owned the parcels located at 522 Washington Avenue, referred to as the former Buick/Pontiac automotive dealership in the early 1900's. The property was predominantly utilized as an automotive servicing, repair shop, painting facility, and automotive dealership until approximately 1988. The servicing buildings, located north of the dealership and showroom, housed two hydraulic lifts, currently in place, as well as two separate USTs. According to Mr. Cottingham, one UST was removed from within the automotive storage structure located along the northern boundary of the Subject Property, and a second UST is still currently present, between the showroom structure and the automotive storage structure. Mr. Cottingham has no knowledge of any pertinent spills and/or releases associated with the UST's. Furthermore, Mr. Cottingham explained to Cardno that he believes that UST currently between the showroom and automotive storage structure, was filled with sand or other equivalent following its closure.
- Mr. David Weiss, tenant of the 522 Washington Avenue automotive dealership (resides in upstairs apartment)
 - Mr. Weiss is the current tenant above the former Greenville Buick/Pontiac automotive dealership at 522 Washington Avenue. According to Mr. Weiss, he has lived at this apartment for eight years. He receives electricity and water utilities via the City of Greenville, and natural gas utilities via Atmos. Furthermore, Mr. Weiss explained to Cardno that he has not witnessed any, nor have knowledge of any environmental cleanups, hazardous spills and/or releases, or any other obvious indicators of contamination within his residence or near along the Subject Property.
- Mr. Vernon Murphree, Washington County Fire Marshall
 - Mr. Murphree, with the Washington County Fire Marshall's office explained to Cardno that to his knowledge, the Washington County Fire Department has not responded to any events at the Subject Property with respect to hazardous spill and/or releases.

The completed All Appropriate Inquiry questionnaire based on the answers provided is provided in **Appendix B.**

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9 Non-Scope Considerations

An asbestos-containing materials (ACM) and lead-based paint (LBP) survey was conducted by Mr. Vance Nimrod, P.E., relative to the Old Elks Club, located at 504 Washington Avenue, along the southwestern corner of the Subject Property. These reports, submitted October 5, 2018 on a separate covers, are summarized below:

- **Asbestos Containing Materials:** This survey identified multiple examples of ACM, including samples obtained from vinyl floor covers, mastics and tiles, as well as dry-wall joint compounds. In summary, the report recommended that the floor tile, ceiling textures and joint compounds containing more than 1% asbestos should be removed prior to demolition and/or redevelopment.
- **Lead-Based Paint:** This survey identified multiple samples, greater than 0.5% lead, including orange wood trim, white ceiling paint as well as multiple colored wall paints. The report recommended that all existing lead-based paint be removed prior to demolition and/or redevelopment.

A copy of these reports are included in **Appendix I**.

The remaining buildings throughout the Subject Property were not surveyed for asbestos or lead-based paint. Based on the age of the existing structures, the presence of both ACM and LBP is possible. Cardno recommends that ACM and LBP surveys be conducted on the remaining structures prior to demolition and/or redevelopment activities.

No other collection or any other investigation for the purpose of determining the possible presence of radon, mold, and/or any other potential contaminants requiring specialized testing procedures or sampling were conducted during this investigation. No assessment was conducted for the possible presence or absence of wetlands and no determination is offered with regard to the suitability of the subject site for development or for any other specific use or purpose.

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10 Findings and Opinions

Cardno has completed a Phase I Environmental Site Assessment (ESA) of the Subject Property, identified as the 500 block of Washington Avenue, Greenville, Washington County, Georgia. This report has been prepared in general accordance with *40 CFR Part 312 Standards and Practices for All Appropriate Inquiries* and *ASTM Standard Practices E1527-13 for Environmental Site Assessments*.

10.1 Findings

Phase I ESA investigations seek to identify known or suspect RECs, historical RECs, and de minimis conditions. De minimis conditions are those that are judged to not present a material risk of harm to health or the environment.

This assessment has identified four (4) recognized environmental conditions (RECs) in connection with the subject property. The identified RECs consist of the following:

1. Buick/Pontiac Dealership

The former Buick/Pontiac dealership was located at 522 Washington Avenue, and has been a historical automotive repair, parts storage, and vehicle maintenance facility from the late 1920s until the 1980s. During the site inspection, in-ground lifts were identified within the former maintenance area. Based on its current condition and historical use, there is potential from a release from this facility that may require additional investigation.

2. Buick/Pontiac Dealership - USTs

According to interviews and historical records, this facility supported one 800-gallon and one 400-gallon gasoline underground storage tanks (USTs), both installed in the early 1970s and reportedly out of use in the late 1980s. According to the Mississippi Department of Environmental Quality (MDEQ), the USTs are permanently out of use in the ground and have not been removed. During the site inspection, one vent pipe was located to the south of the north vacant building. Based on its current condition and historic use, there is potential for a release from the USTs that may require additional investigation.

3. Summerlin Gas Station

The Summerlin gas station was historically located at 536 Washington Avenue (location of the current Guaranty Bank and Trust Company). This facility operated between approximately 1940 and 1960. No records or information of the gas stations underground storage tanks (USTs) were identified with Mississippi Department of Environmental Quality (MDEQ). Reportedly the USTs were removed with the development of the current building in the early 1960s. Based on its historic use, there is potential for a release from this facility that may require additional investigation.

4. Mystic Rose Entertainment, Inc., the current owner of three of the seven parcels included in this report, did not grant Cardno access to the former automotive dealership located at 522 Washington Street and the vacant structures located along the northeastern portion of the Subject Property during this assessment. Given the historic automotive related uses and potentially hazardous nature of these facilities, Cardno considers this lack of access as a REC in connection with the Subject Property.

This assessment has identified non-scope considerations in connection with the subject property. The identified non-scope considerations consist of the following:

1. An asbestos and lead-based paint inspection was conducted on the Elks Lodge (504 Washington Avenue) and completed in September 2018. The investigation identified various floor tiles and underlying mastic, wall and ceiling texturing, and drywall / joint compound located throughout as asbestos containing materials. The investigation identified several painted surfaces, including on wood trim and walling located throughout as lead-based paint.
2. Based on the age of the remaining buildings observed throughout the Subject Property, the possibility of lead-based paint on the interior/exterior to exists. Cardno recommends a lead-based paint survey be conducted prior to future site development activities.
3. Based on the age of the remaining buildings observed throughout the Subject Property, the possibility of asbestos-containing materials (ACM) exists. Cardno recommends an additional ACM survey be conducted prior to future site development activities.

10.2 Conclusions/Recommendations

Based on this Phase I ESA data, Cardno recommends the following:

- The interior of Buick /Pontiac Dealership should be inspected by an environmental professional to determine if there are additional RECs.
- Environmental soil and groundwater testing should be conducted at the location of the former Greenville Buick/Pontiac dealership to determine the extent of the identified potential contamination from historic auto repair activities and in-ground hydraulic lifts.
- Environmental soil and groundwater testing should be conducted at the location of the historic gas station to determine the extent of potential contamination.
- An assessment and subsequent removal of the USTs identified in connection with the former Greenville Buick/Pontiac automotive dealership, located at 522 Washington Avenue.
- Prior to the disturbance of any of the identified asbestos and lead-based paint containing materials at the Elks Lodge during redevelopment or demolition activities, appropriate local, state, and federal regulations need to be followed. Specifically, asbestos containing materials should be abated by a licensed abatement contractor. In addition, it is recommended that any building debris should be analyzed for lead via toxicity characteristic leachate procedure (TCLP) to determine its waste characterization for disposal purposes prior to its removal.
- Prior to renovation or demolition, the remaining buildings should be inspected for asbestos and lead-based paint by a licensed inspector.

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11 References

GeoSearch. *Radius Report*, Order Number 114812

GeoSearch. *Physical Setting Report*, Order Number 114812

GeoSearch. *Aerial Photo Decade Package*, Order Number 114812

GeoSearch. *Historical Topographic Maps*, Order Number 114812

GeoSearch. *Historical City Directories*, Order Number 114812

United States Department of Agriculture (USDA), Natural Resources Conservation Service
Custom Soil Resource Report

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12 Qualifications/Signatures of Environmental Professional(s)

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312.10. I certify that this report has been prepared in general accordance with 40 CFR Part 312 and ASTM E 1527-13 Standard Practice for Environmental Site Assessments.

I further certify that, in my professional judgment, this report meets the requirements of 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries. I have the specific qualifications based on training, experience and registration to perform and/or assist in the assessment of a property of the nature, history and setting of the subject property.

for Cardno



Douglas Strait, PE
Project Manager

Date: October 24, 2018

I declare this "*Phase I Environmental Site Assessment*" Report meets or exceeds Cardno's standards for editorial content, technical accuracy, and quality assurance verification. All data and calculations presented herein have been checked for accuracy and the basis for all conclusions and recommendations have been described.

for Cardno



Keith Ziobron
Branch Manager

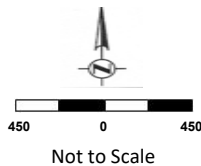
Date: October 24, 2018

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LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



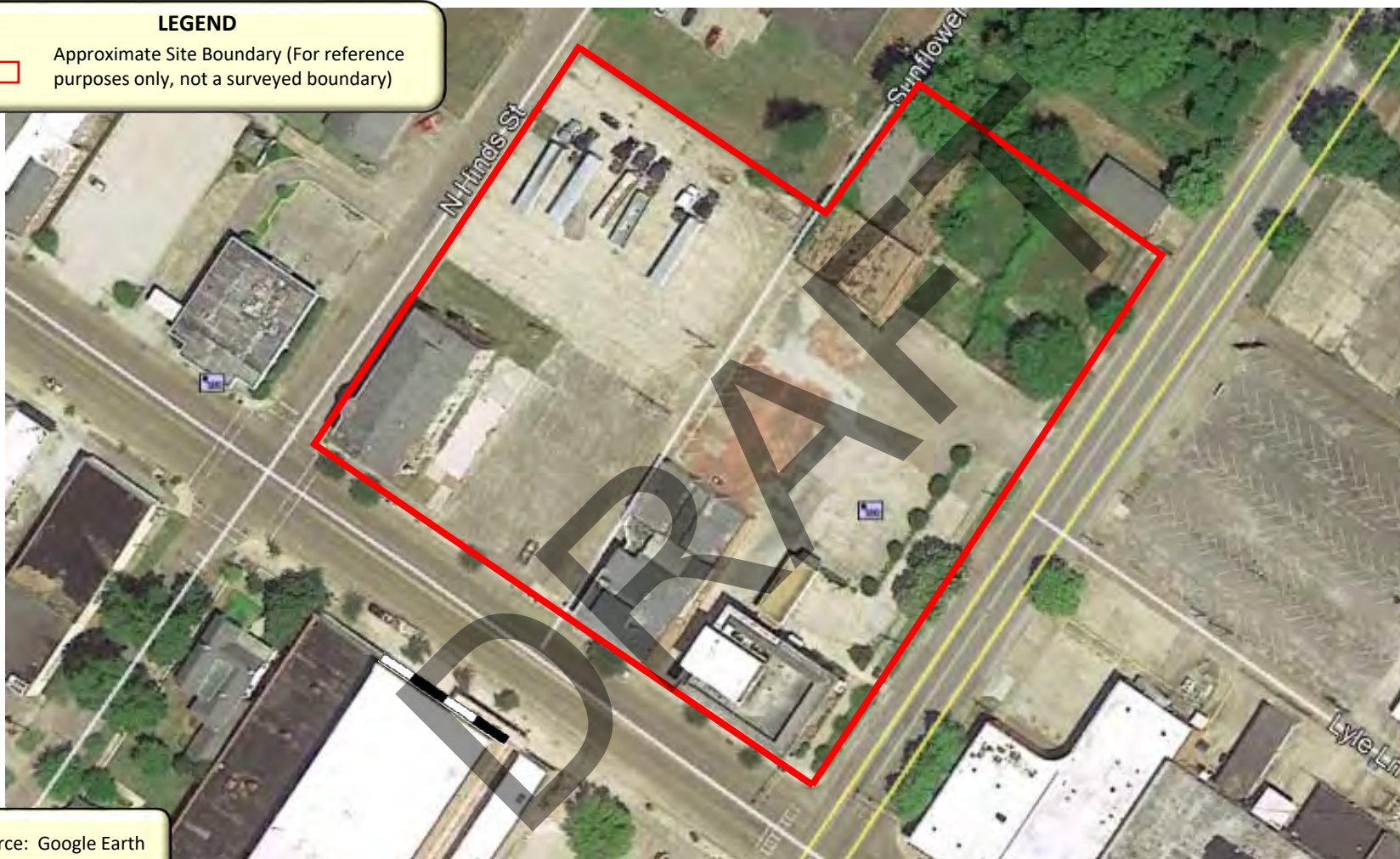
Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 1
USGS/Site Vicinity Map
Source: USGS 2012

LEGEND



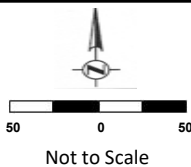
Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Source: Google Earth



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 2a
Site Boundary Map

LEGEND



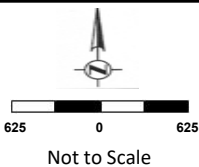
Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Source: Washington County Tax Assessor



"This is not a map of survey."



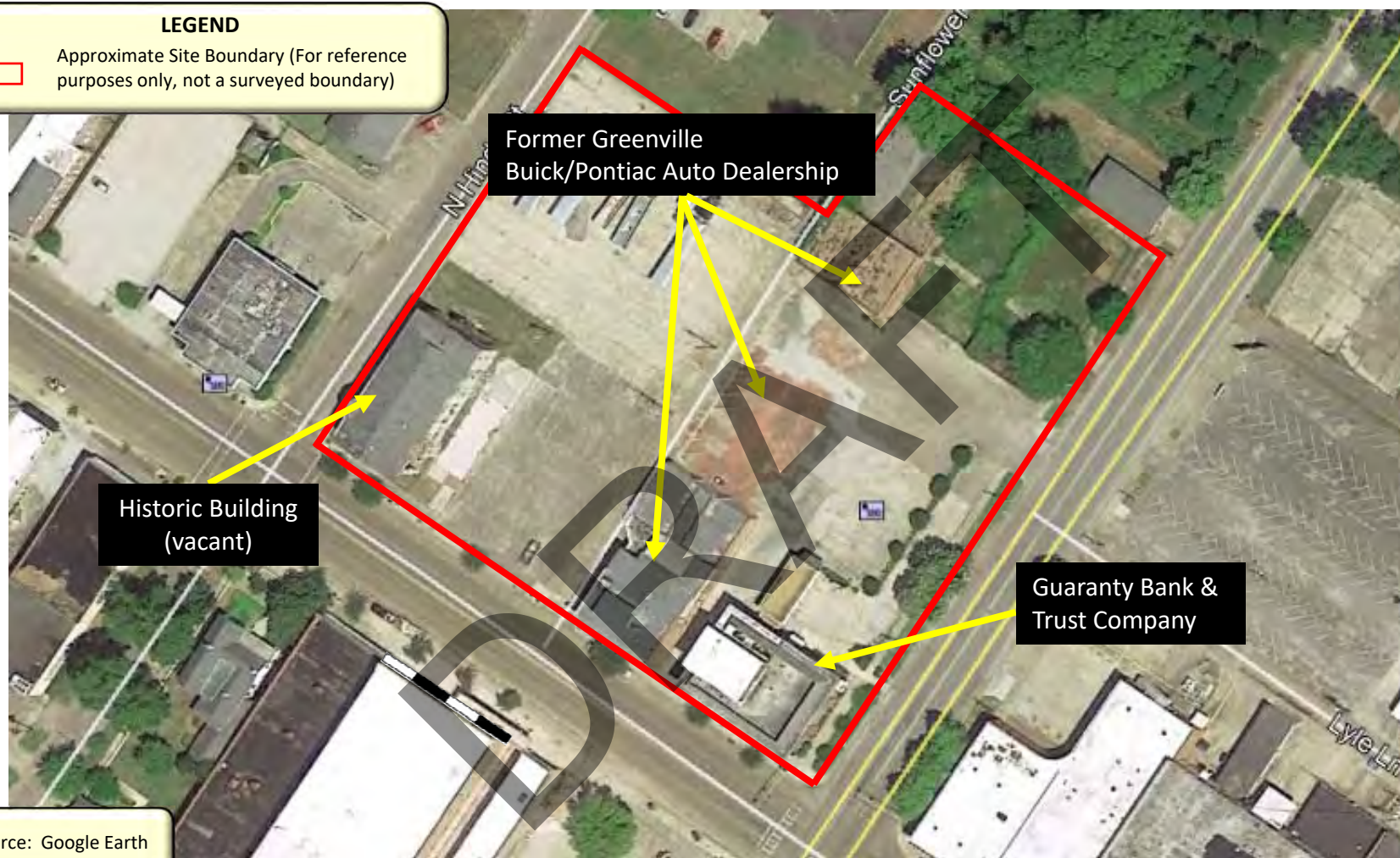
Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

**Figure 2b
Tax Map**

LEGEND



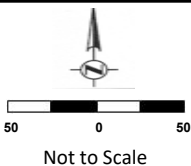
Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Source: Google Earth

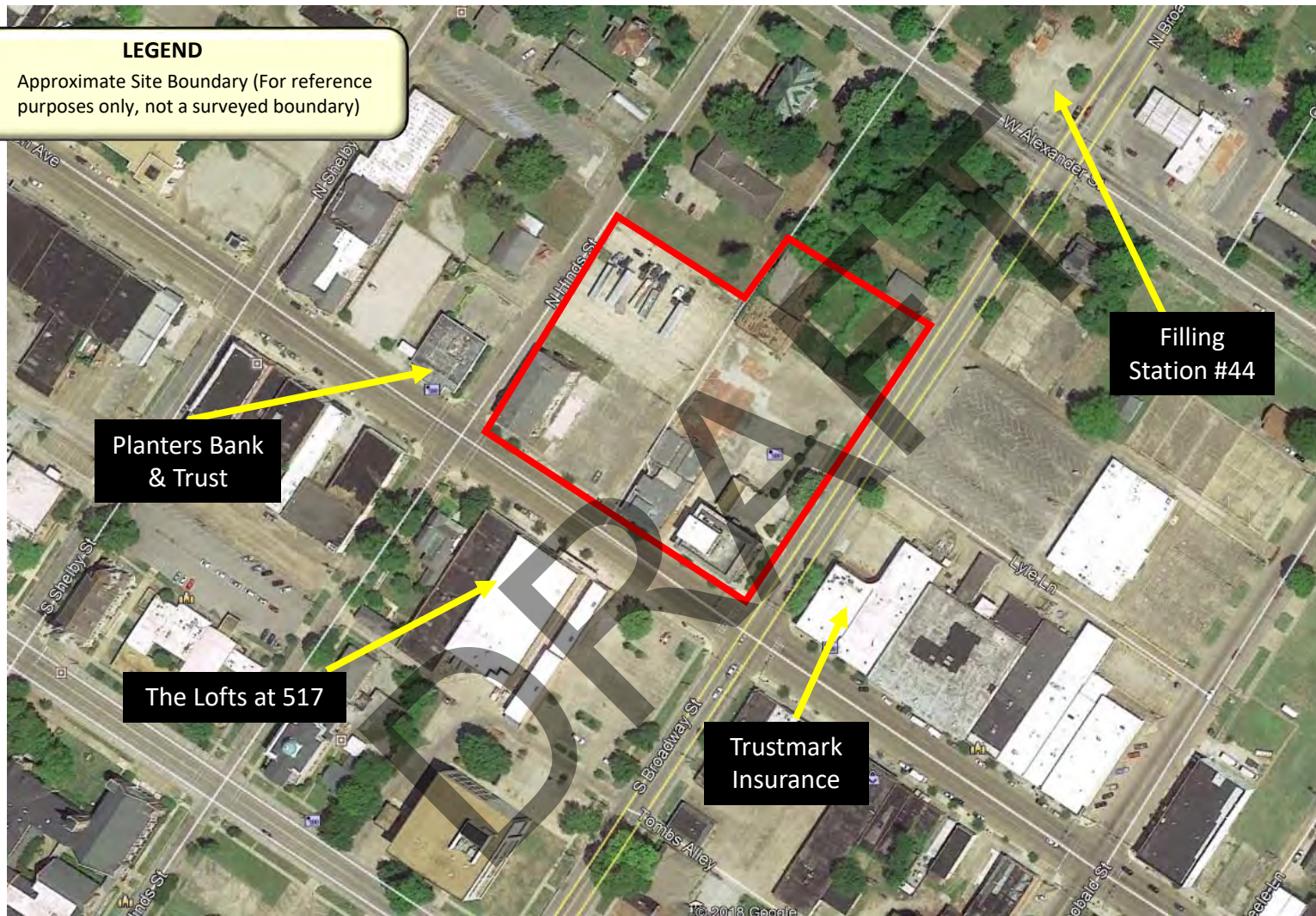


"This is not a map of survey."




Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 3a
Site Land Use Map



LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)

Planters Bank
& Trust

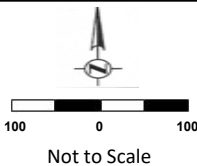
The Lofts at 517

Trustmark
Insurance

Filling
Station #44



Not a map of survey
Base Image Google 2017



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 3b
Surrounding Land Use Map

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)

Historic automotive paint, repair, washing greasing (1931 & 1950 FIM Maps, REC #1)

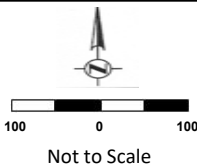
Historic automotive painting and storage facility (1950 maps) & UST (REC #1 and 2)

Historic automotive servicing (REC #1)

Historic Summerlin gasoline service station (REC #3)



Not a map of survey
Base Image Google 2017



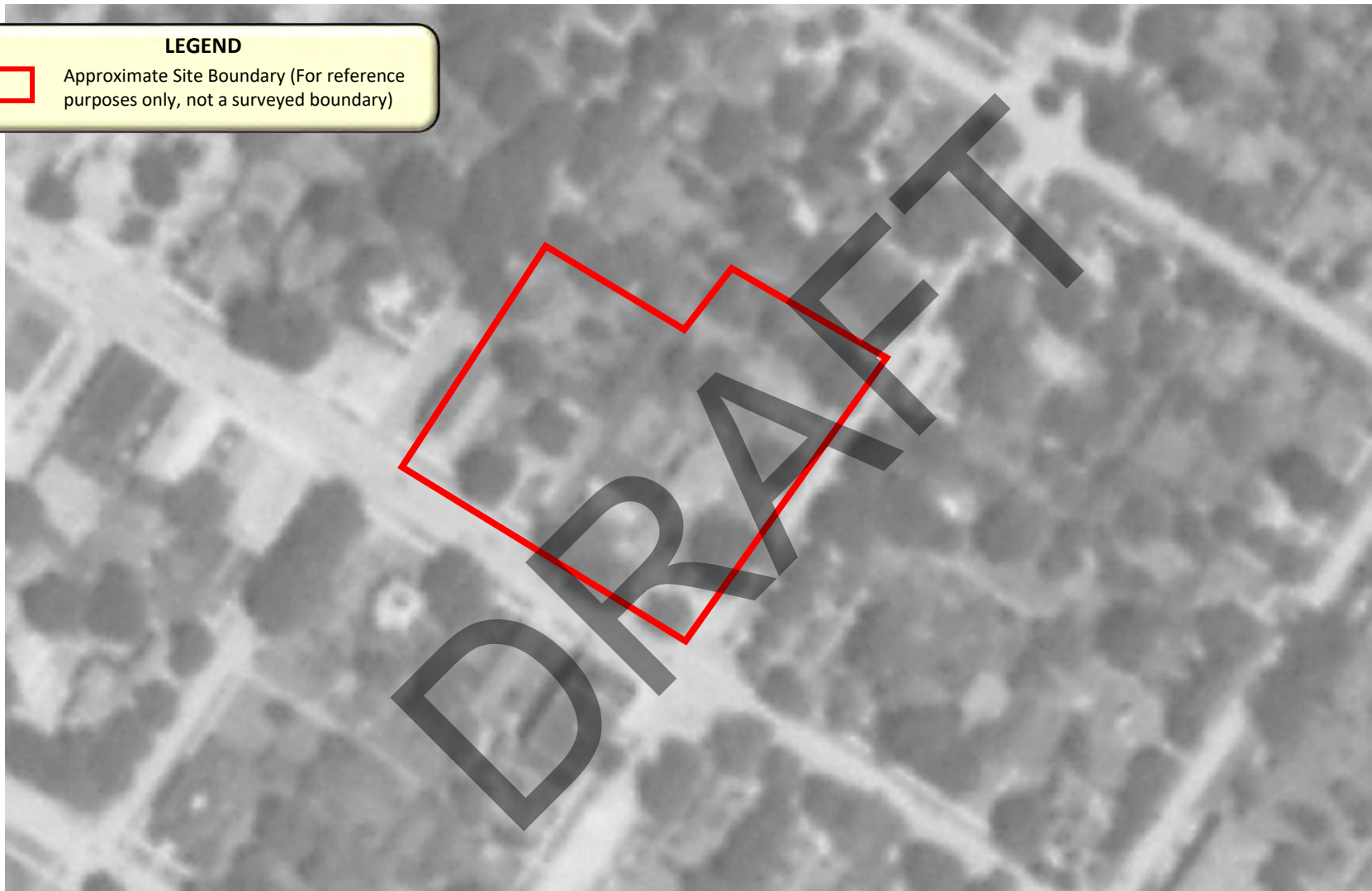
Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

**Figure 3c
REC Map**

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4a
1938 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4b
1943 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



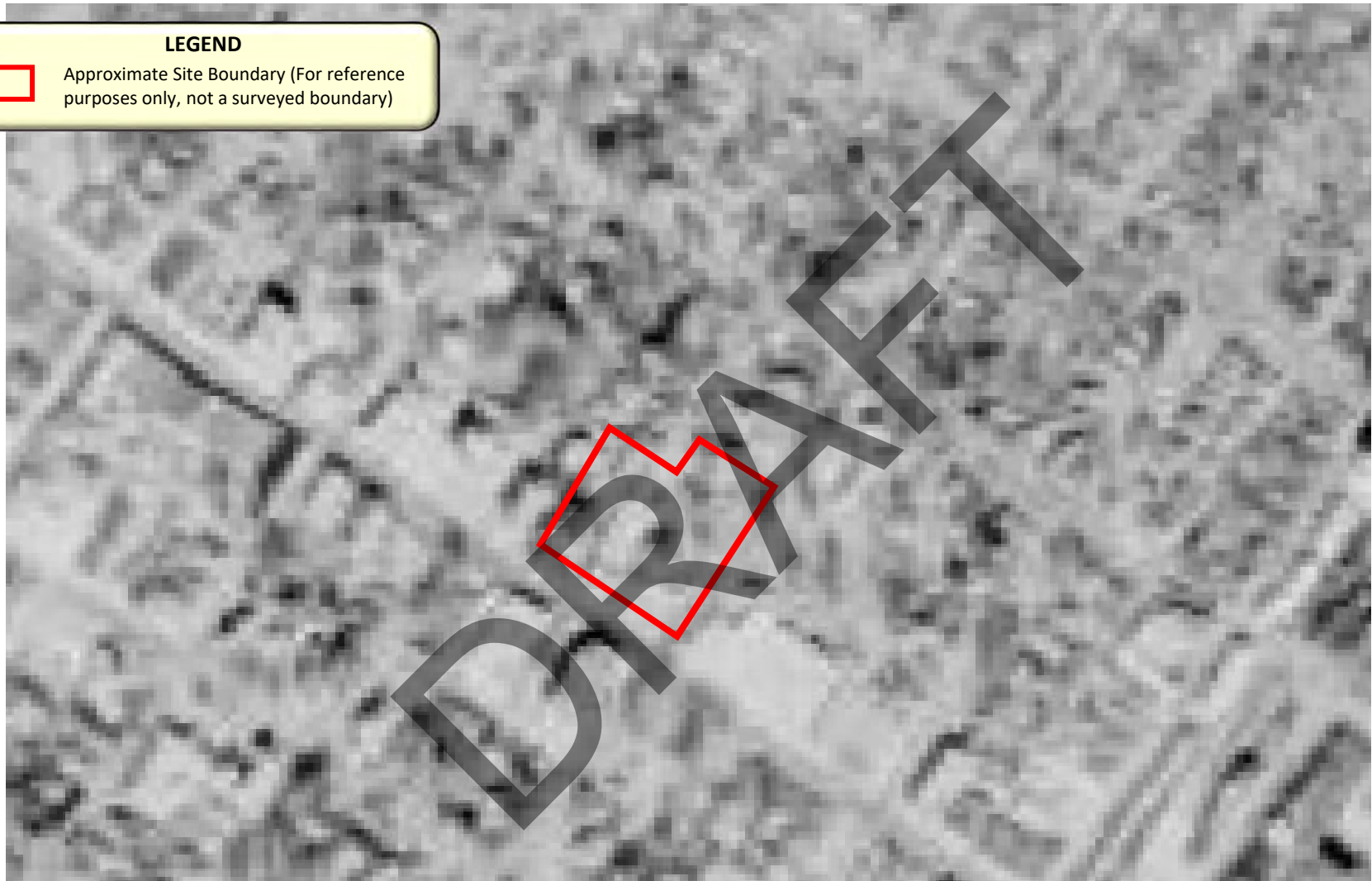
Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4c
1949 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4d
1957 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4e
1967 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4f
1974 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4g
1984 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4h
1992 Aerial Photograph



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4i
1996 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4j
2001 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4k
2004 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4I
2005 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4m
2006 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4n
2007 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4o
2009 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4p
2010 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4q
2012 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4r
2014 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)

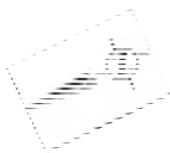
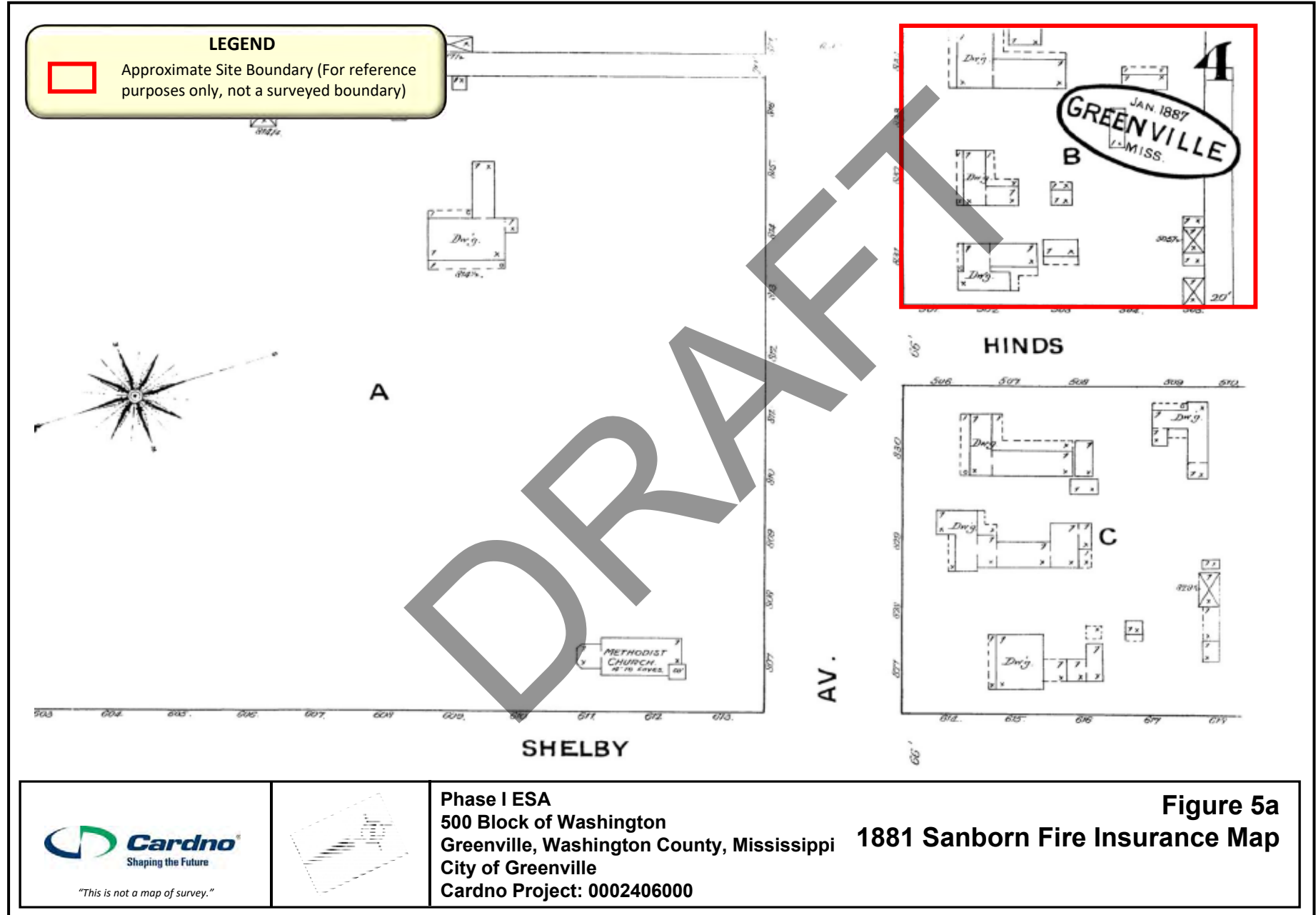


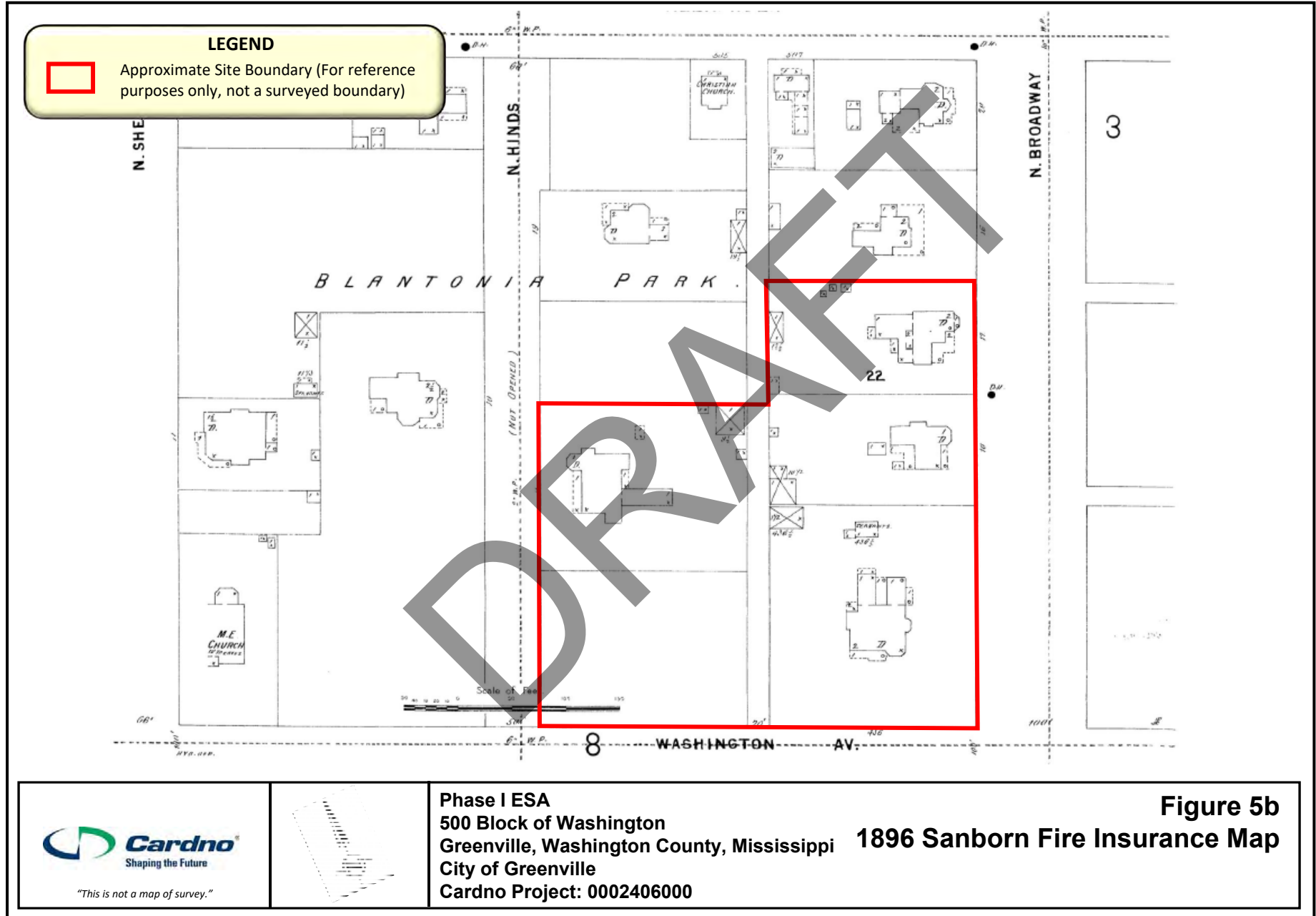
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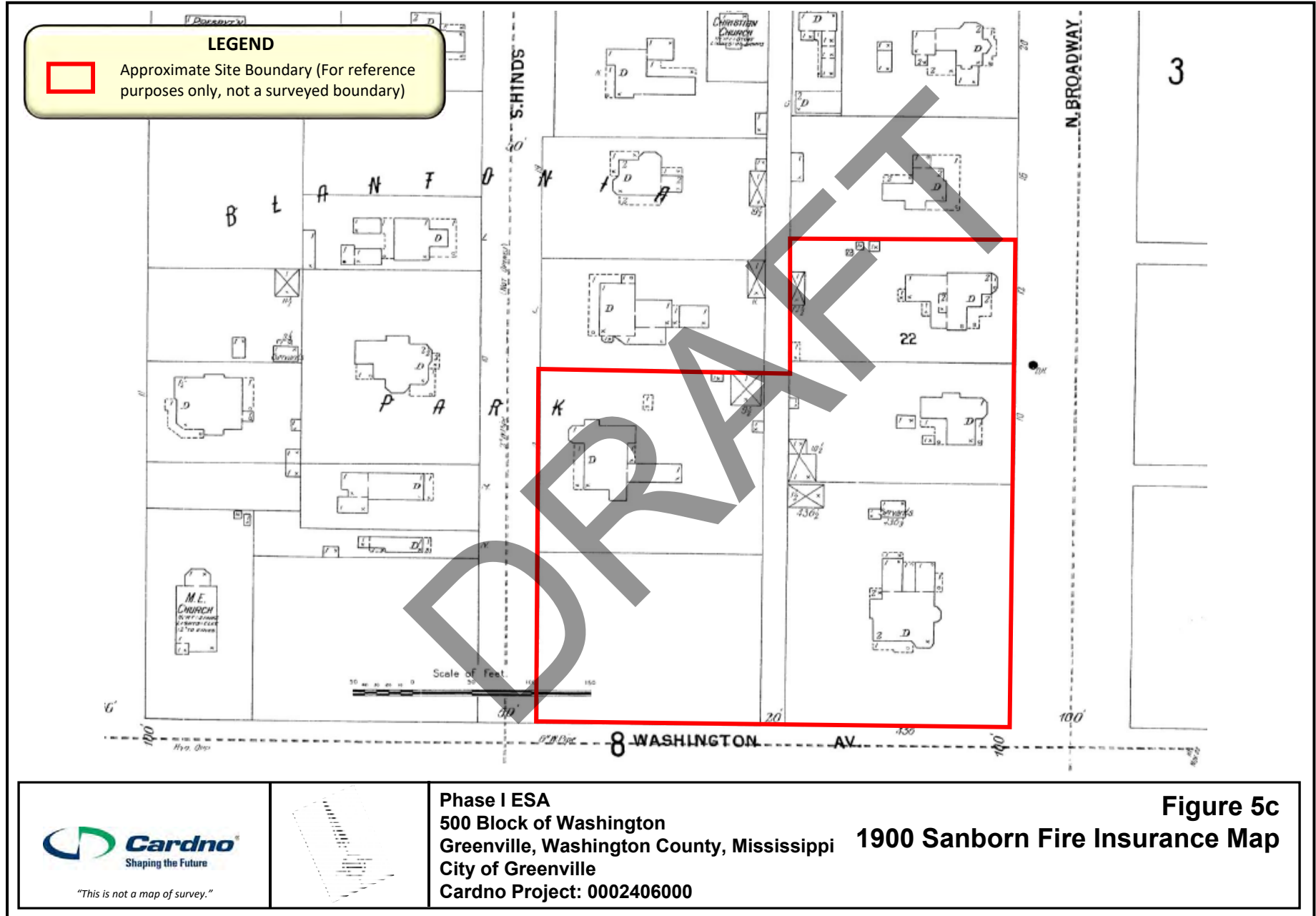


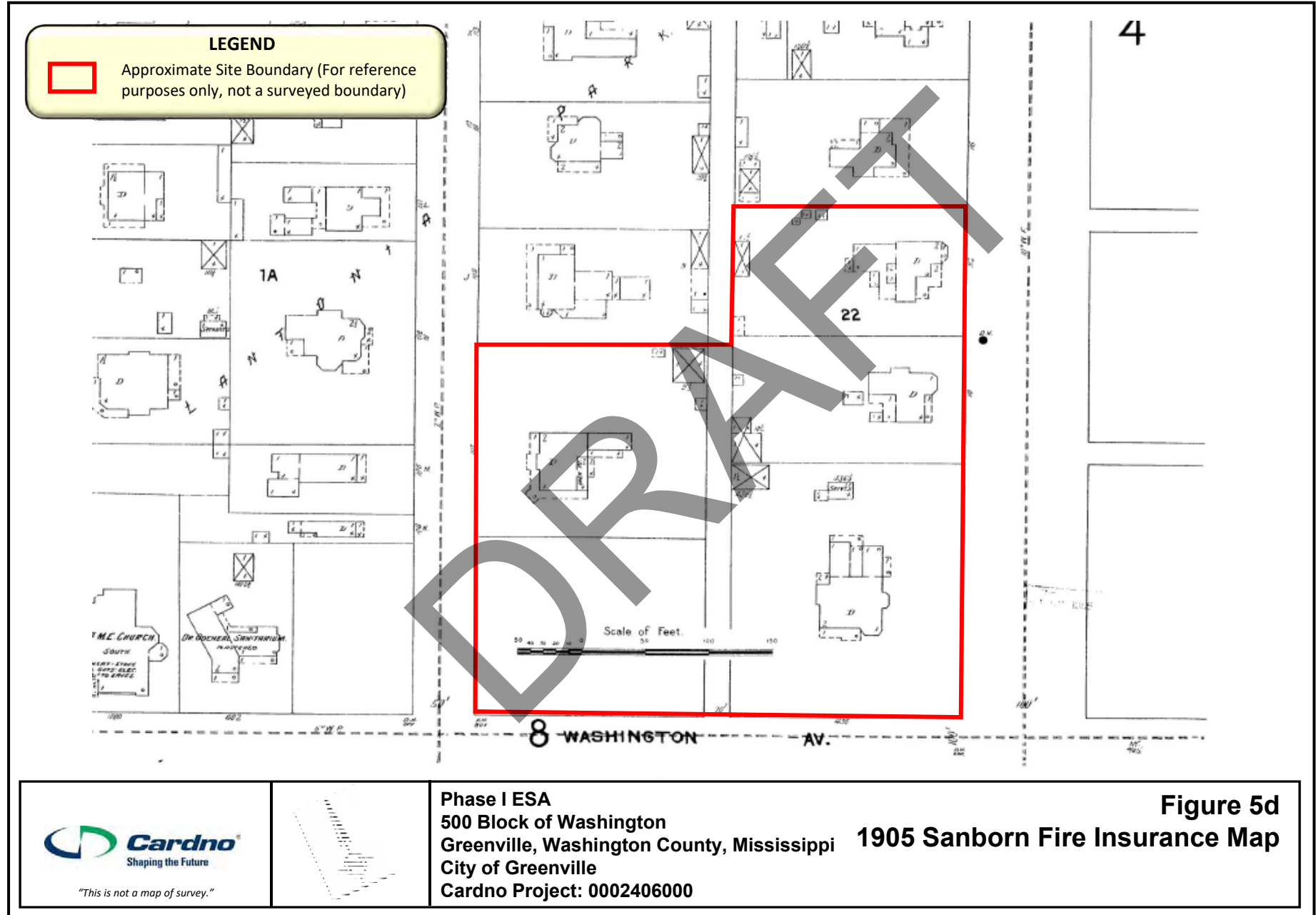
Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

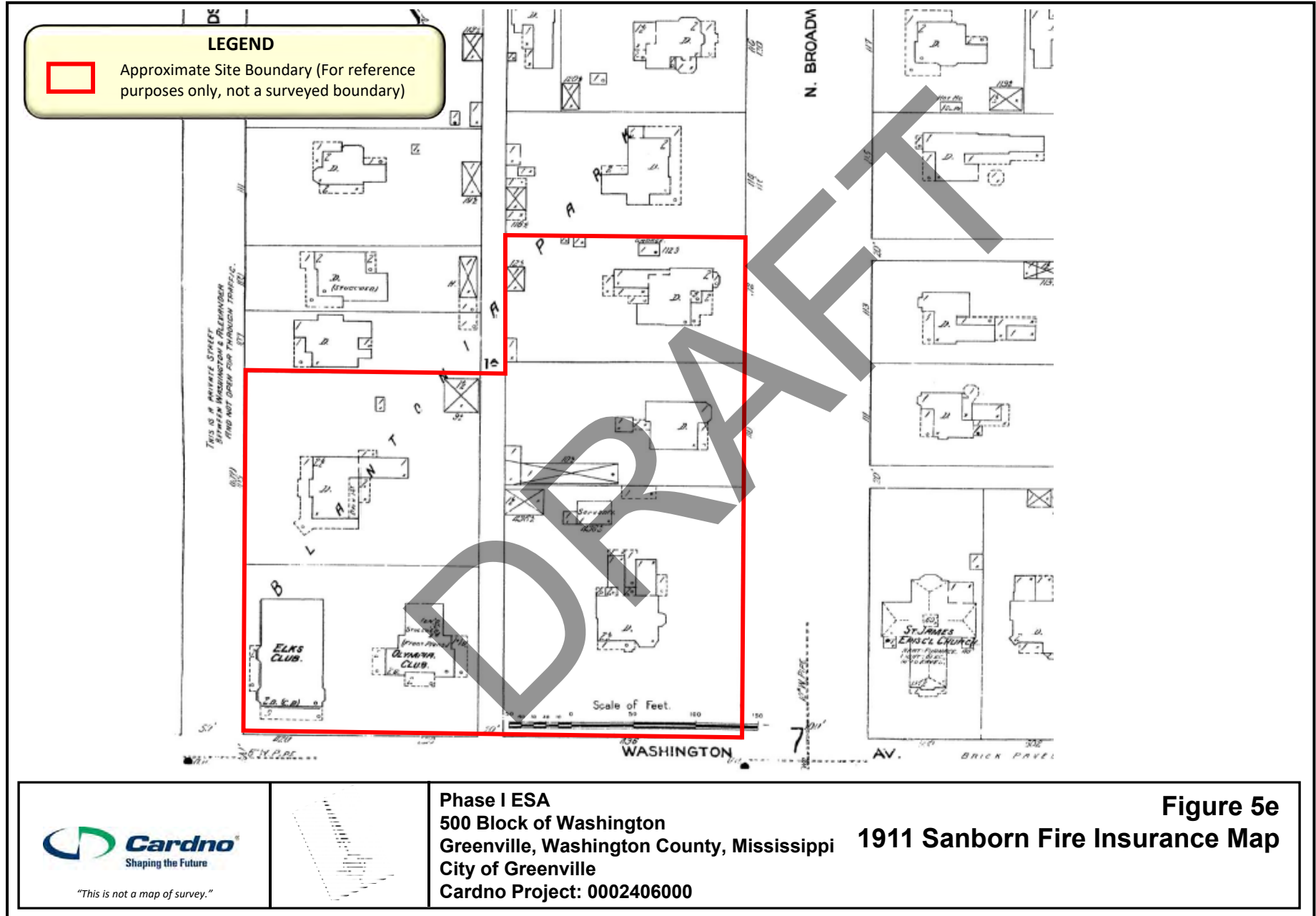
Figure 4s
2014 Aerial Photograph

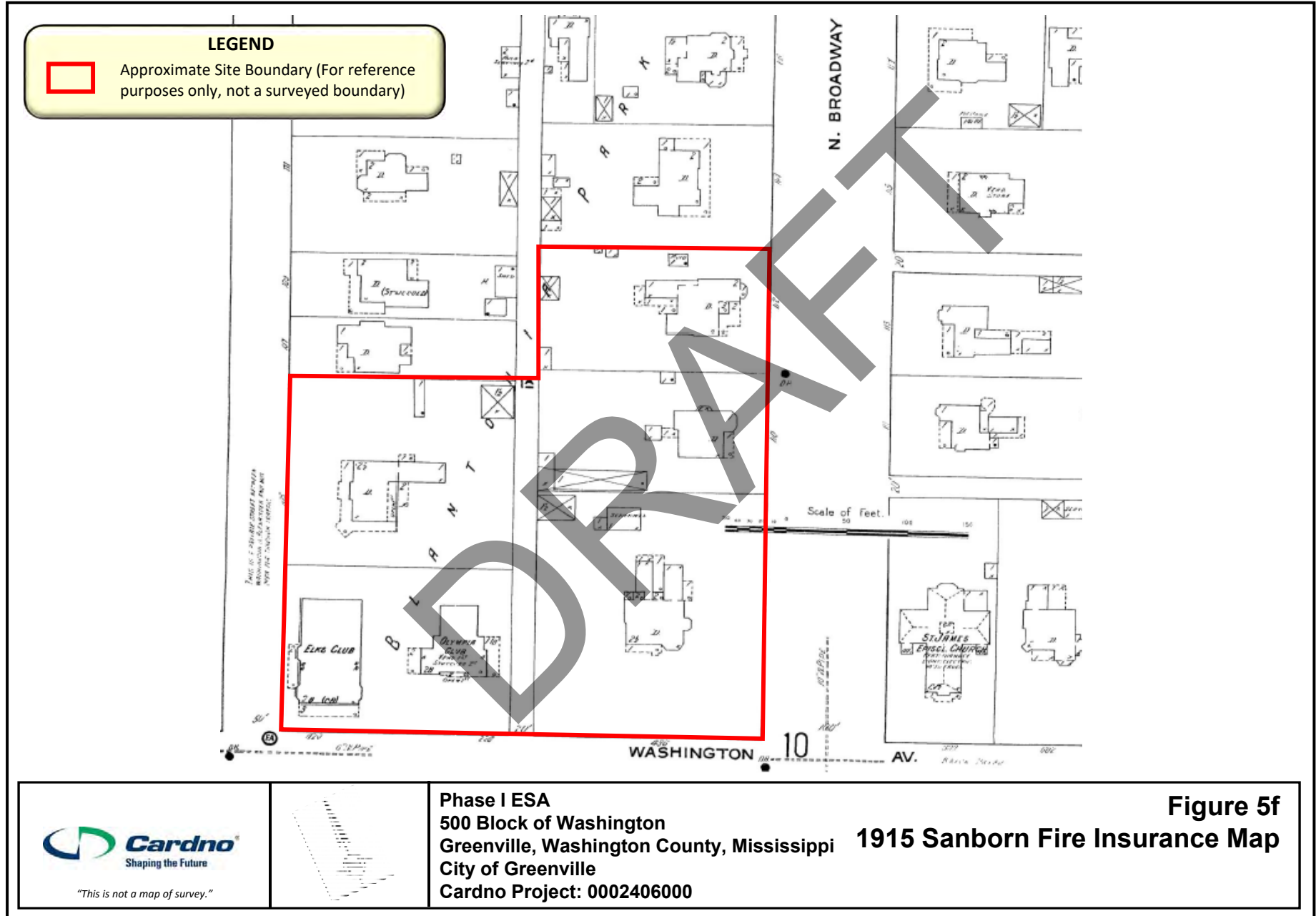


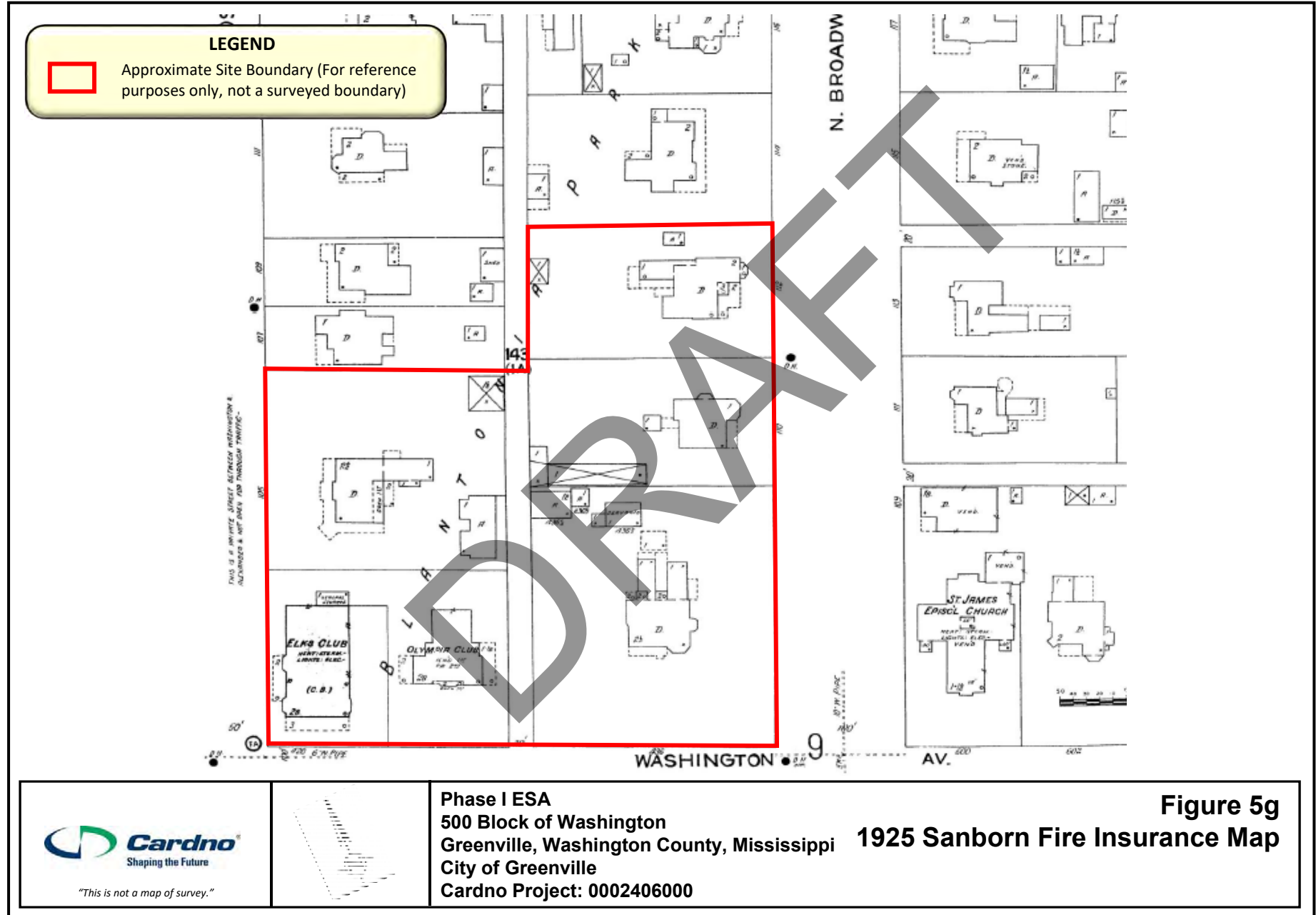


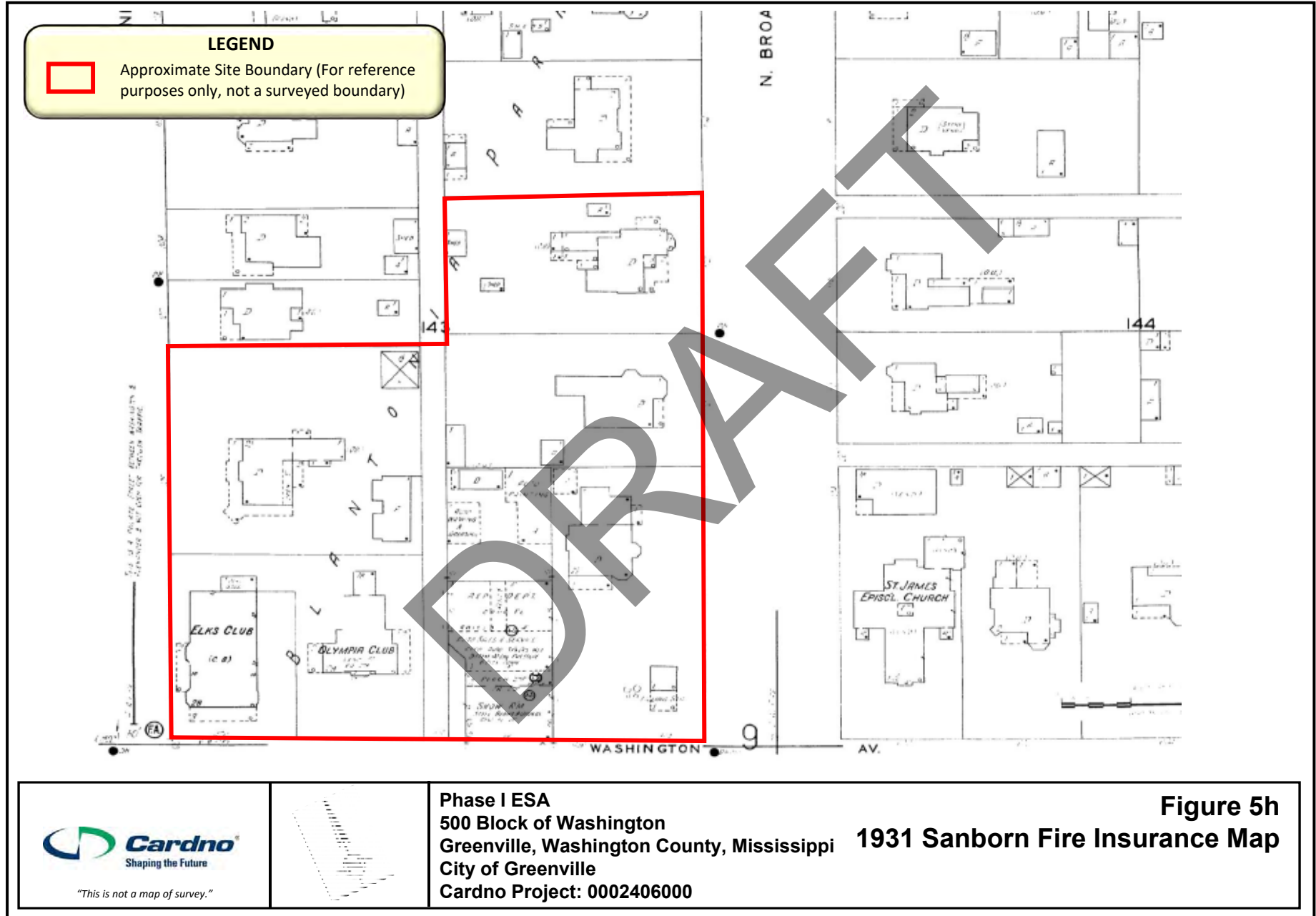








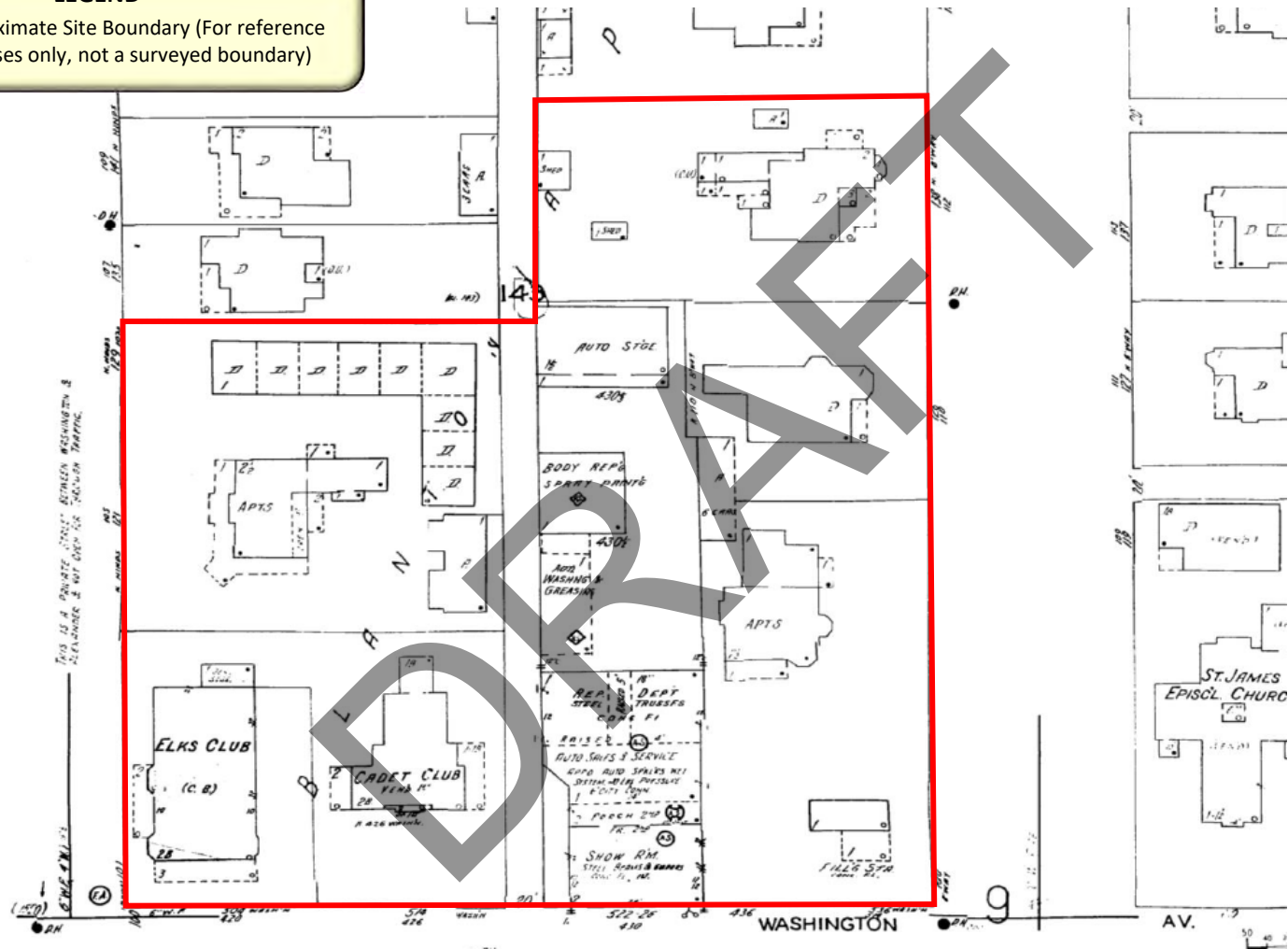




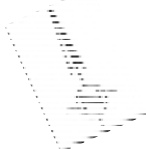
LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 5i
1950 Sanborn Fire Insurance Map

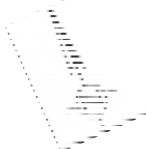
LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."



Phase I ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 5j
1968 Sanborn Fire Insurance Map

Appendix A

Photographic Log

DRAFT

PHOTOGRAPHIC LOG



Client Name: City of Greenville, MS

Site Location: 500 block of Washington Avenue

Project No.
0002406000

Photo No.

1

Date:

09/21/18

Direction Photo Taken:

WNW

Description:

Image of the former Elks Lodge, located near the southwestern corner of the Subject Property at 504 Washington Avenue.



Photo No.

2

Date:

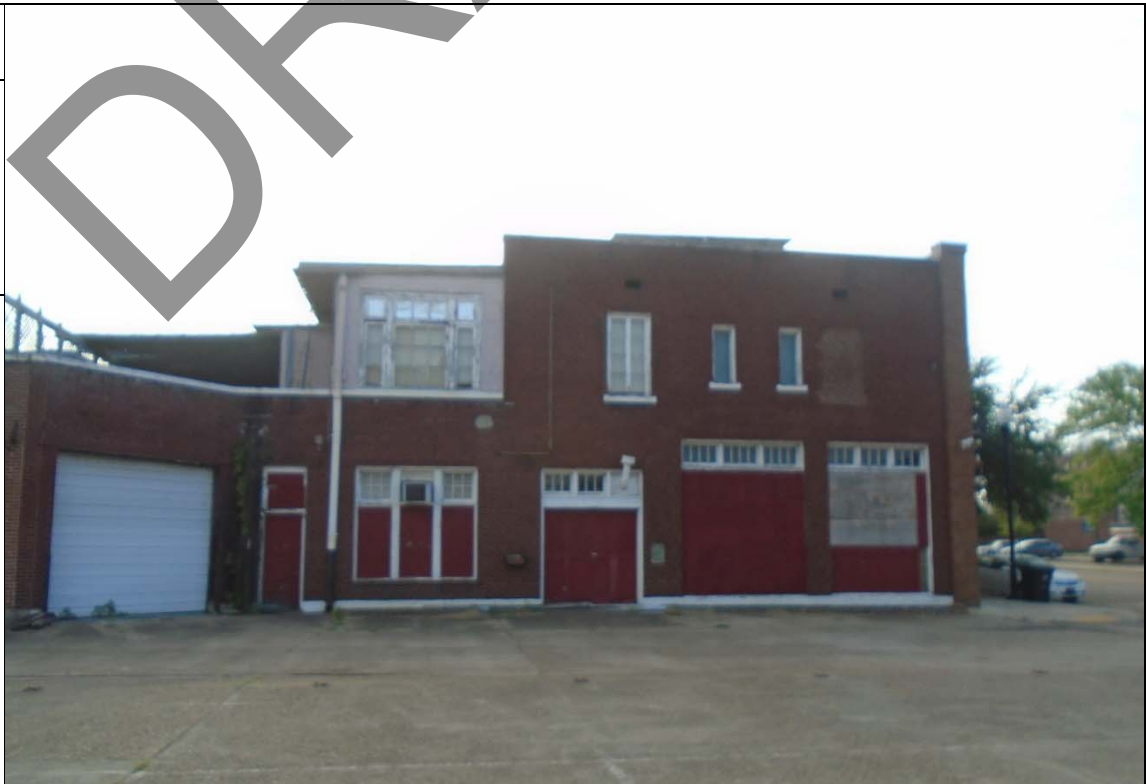
09/21/18

Direction Photo Taken:

ESE

Description:

Image of the former Greenville Buick automotive dealership, located at 522 Washington Avenue.



PHOTOGRAPHIC LOG



Client Name: City of Greenville, MS

Site Location: 500 block of Washington Avenue

Project No.
0002406000

Photo No.
3

Date:
09/21/18

Direction Photo Taken:

S

Description:

Image of the concrete slab-on-grade observed throughout much of the Subject Property, east of the former Elks Lodge.



Photo No.
4

Date:
09/21/18

Direction Photo Taken:

SW

Description:

Image of the vacant storage facility, located along the northern portion of the Subject Property.



PHOTOGRAPHIC LOG



Client Name: City of Greenville, MS

Site Location: 500 block of Washington Avenue

Project No.
0002406000

Photo No.

5

Date:

09/21/18

Direction Photo Taken:

ENE

Description:

Image of the Greenville Buick automotive dealership and service facility located at 522 Washington Avenue.



Photo No.

6

Date:

09/21/18

Direction Photo Taken:

N/A

Description:

Interior image of the Guaranty Bank & Trust building located at 536 Washington Avenue



PHOTOGRAPHIC LOG



Client Name: City of Greenville, MS

Site Location: 500 Block of Washington Avenue

Project No.
0002406000

Photo No.

7

Date:

09/21/18

Direction Photo Taken:

N/A

Description:

Image of a utility closet within the guaranty Bank & Trust building located at 536 Washington Avenue



PHOTOGRAPHIC LOG

Photo No.

8

Date:

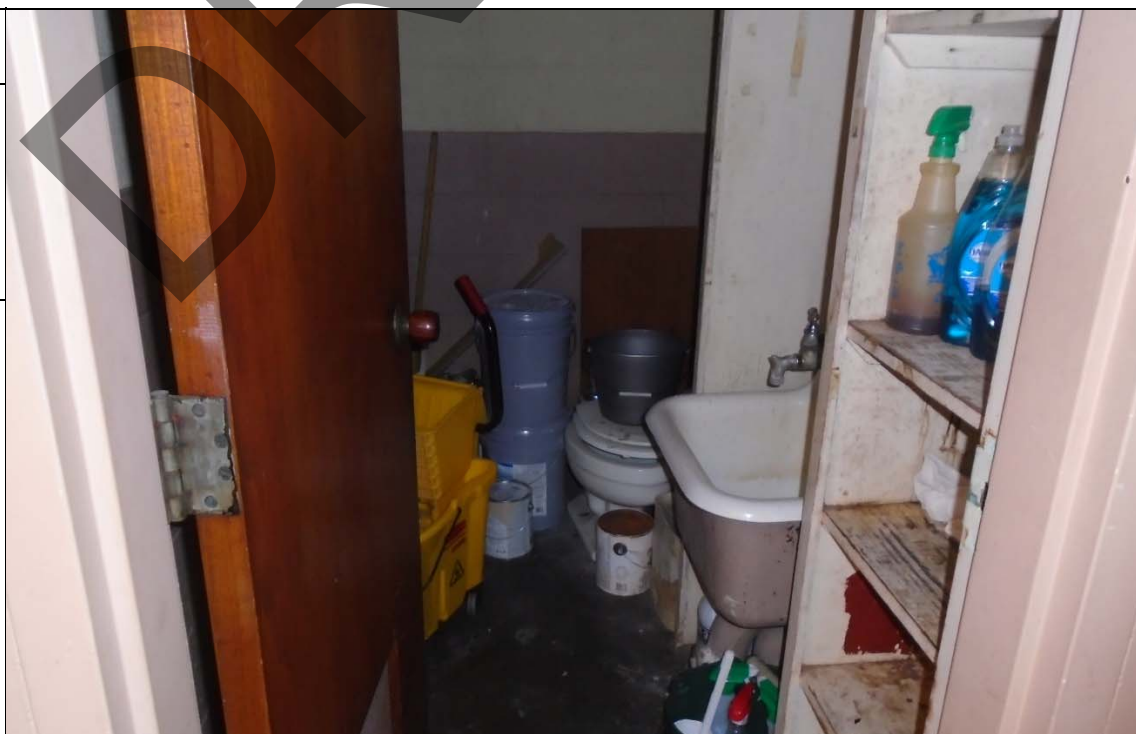
09/21/18

Direction Photo Taken:

N/A

Description:

Image of a utility closet within the guaranty Bank & Trust building located at 536 Washington Avenue



PHOTOGRAPHIC LOG



Client Name: City of Greenville, MS

Site Location: 500 Block of Washington Avenue

Project No.
0002406000

Photo No.
9

Date:
09/21/18

Direction Photo Taken:

N/A

Description:

Interior image of the main electrical closet with the Guaranty Bank & Trust building at 536 Washington Avenue.



PHOTOGRAPHIC LOG

Photo No.
10

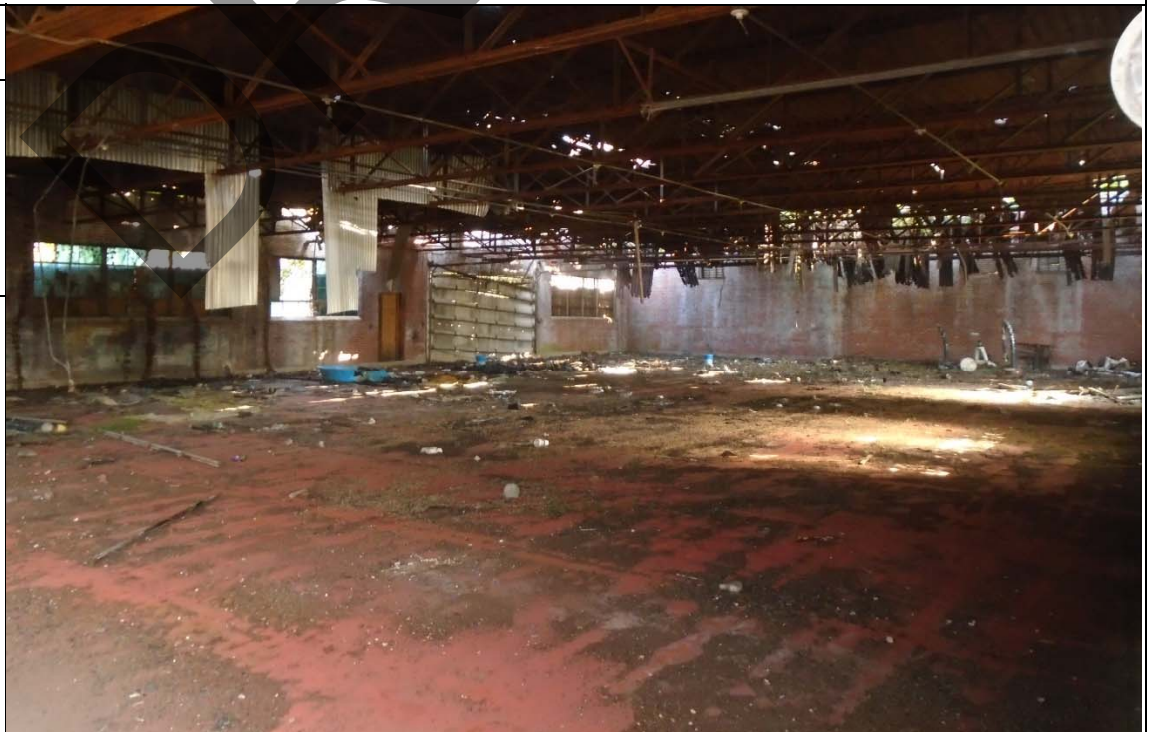
Date:
09/21/18

Direction Photo Taken:

N/A

Description:

Interior image within the vacant storage facility located along the northern portions of the Subject Property.



PHOTOGRAPHIC LOG



Client Name: City of Greenville, MS

Site Location: 500 Block of Washington Avenue

Project No.
0002406000

Photo No.
11

Date:
09/21/18

Direction Photo Taken:

N/A

Description:

Image of a utility closet within the guaranty Bank & Trust building located at 536 Washington Avenue



PHOTOGRAPHIC LOG

Photo No.
12

Date:
09/21/18

Direction Photo Taken:

N/A

Description:

Image of a utility closet within the guaranty Bank & Trust building located at 536 Washington Avenue



Appendix C3

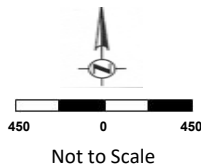
Tables and Figures from Cardno's On-going Phase II ESA Investigation

DRAFT

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Phase II ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 1
USGS/Site Vicinity Map
Source: USGS 2012

LEGEND



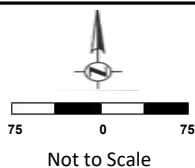
Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Source: Google Earth



"This is not a map of survey."



Phase II ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 2
Site Boundary Map

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)

Historic automotive paint, repair, washing greasing (1931 & 1950 FIM Maps, REC #1)

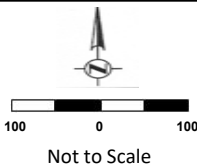
Historic automotive painting and storage facility (1950 maps) & UST (REC #1 and 2)

Historic Summerlin gasoline service station (REC #3)

Historic automotive servicing (REC #1)



"This is not a map of survey."

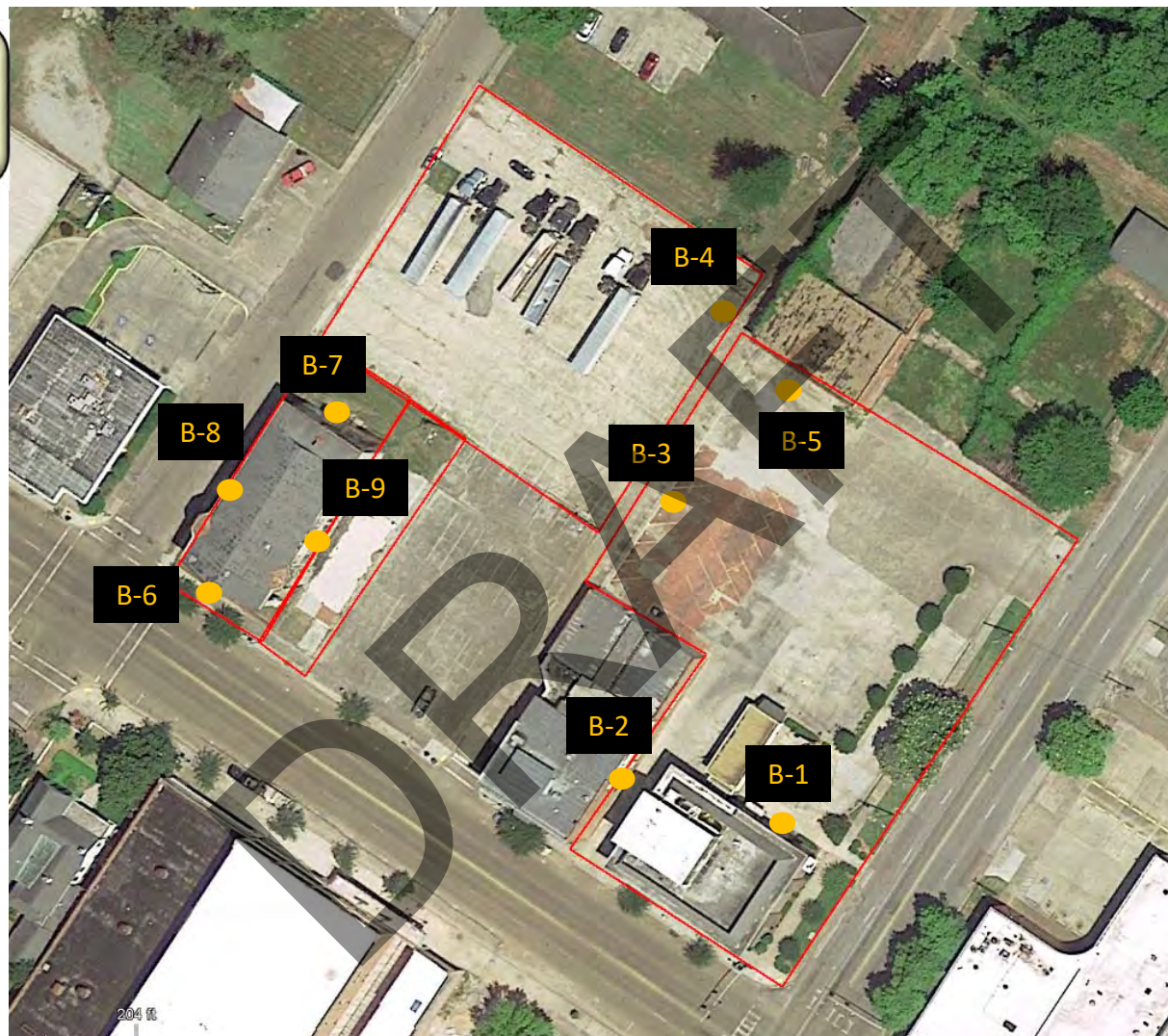


Phase II ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 3
REC Location Map

LEGEND

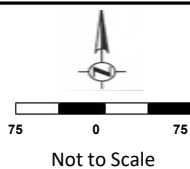
- Property Boundary
- Soil Boring Location



Source: Google Earth





"This is not a map of survey."



Phase II ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 4
Soil Boring Location Map

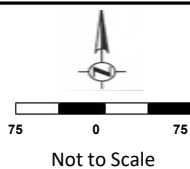
LEGEND

-  Property Boundary
-  Groundwater Monitoring Well Location

Source: Google Earth



"This is not a map of survey."



Phase II ESA
500 Block of Washington
Greenville, Washington County, Mississippi
City of Greenville
Cardno Project: 0002406000

Figure 5
Groundwater Monitoring Well
Location Map

Table 2: Soil Analytical Summary (Detections Only)

Site Name: 500 Block of Washington Avenue
Greenville, MS

Sample			OVA	RCRA Metals						VOCs	
Boring/ Well No.	Date Collected	Sample depth (fbls)	Net OVA Reading (ppm)	Arsenic (mg/Kg)	Barium (mg/Kg)	Cadmium (mg/Kg)	Chromium (mg/Kg)	Lead (mg/Kg)	Mercury (mg/Kg)	Tetrachloroethylene (mg/kg)	Methylene Chloride (mg/kg)
B-1	12/18/2018	2	10.2	5.59	118	1.23	33.50	23.70	1.94	BRL	0.0338
B-2	12/18/2018	2	8.0	4.93	164	1.36	27.80	150	2.21	BRL	BRL
B-3	12/18/2018	14	8.0	4.41	155	1.56	35	12.30	2.62	BRL	0.27
B-4	12/17/2018	8	3.7	3.45	113	1.01	25	8.83	1.40	BRL	BRL
B-5	12/17/2018	12	5.6	5.76	153	1.37	32.90	10.30	3.50	0.00168	0.01170
B-6	12/17/2018	0.5	0.0	N/A	N/A	N/A	N/A	1,190	N/A	N/A	N/A
B-6	12/17/2018	3.5	0.0	N/A	N/A	N/A	N/A	13.70	N/A	N/A	N/A
B-7	12/17/2018	1.5	0.0	N/A	N/A	N/A	N/A	9.44	N/A	N/A	N/A
B-8	12/17/2018	1	0.0	N/A	N/A	N/A	N/A	513	N/A	N/A	N/A
B-8	12/17/2018	3	0.0	N/A	N/A	N/A	N/A	191	N/A	N/A	N/A
B-9	12/17/2018	2	6.0	N/A	N/A	N/A	N/A	10.40	N/A	N/A	N/A
B-10*	12/18/2018	2	0.0	5.28	170.00	1.37	29.80	21.50	5.96	BRL	BRL
Tier 1 TRGs				0.426	5,480	39.1	227**	400	11	11.9	14.3

Notes:

BRL = Below reporting limits

**Regulatory concentration is based on more stringent hexavalent chromium standard

Concentrations in **bold** and highlighted (yellow) exceed Tier 1 TRGs

Concentrations highlighted (gray) were detected but do not exceed Tier 1 TRGs

OVA = organic vapor analyzer

ppm = parts per million

mg/Kg = milligrams per kilogram

fbls = feet below land surface

* = Duplicate sample of B-2

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Threshold Attachment

Copy of the Public Meeting

Advertisement



Notice of Public Meeting

Intent to Apply for FY2019 Environmental Protection Agency (EPA) Brownfield Cleanup and Assessment Grants

The City of Greenville, Mississippi intends to apply for a FY 2019 EPA Brownfields Cleanup Grant to abate asbestos and lead paint, and demolish the former Elks Lodge building at 504 Washington Avenue. **A public meeting will be held on January 16, 2019, from 5:30 p.m. — 7:00 p.m. at the William Alexander Percy Memorial Library at 341 Main Street in Greenville, Mississippi.** A copy of the draft grant proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA) for the project will be available for public review and comment at the meeting.

The City of Greenville will also be applying for a FY2019 EPA Community-wide Brownfield Assessment Grant which will serve to continue the work initiated by the City's FY2017 and FY2014 Community-wide Assessment Grants. Information on the focus of the FY2019 assessment grant application, as well as a summary of progress of the FY2017 Assessment Grant will be discussed. The January 16, 2019, public meeting will also provide an opportunity for the public to provide input on site selection, discuss reuse ideas, ask questions, and more.

For directions, questions, or to review the draft grant proposal and ABCA documents prior to or after the public meeting, please reach out to Everett R. Chinn at (662) 379-3705.

Text above was published in the *Delta Democrat Times* on January 9, 2019.

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Threshold Attachment

Screenshot of Public Meeting TV Public Service Announcement

2019 EPA CLEANUP GRANT

Greenville

Public Meeting

Where: William A. Percy Library

When: Wednesday, Jan. 16th

Time: 5:30 p.m.- 7:00 p.m.

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Threshold Attachment

**Public Meeting Summary
Including comments, response and summary**

Community Engagement Meeting Summary and Responses to Comments

FY2017 EPA Brownfields Assessment Grant
FY2019 EPA Cleanup Grant Application
FY2019 EPA Assessment Grant Application

Greenville, Mississippi

Meeting Date: January 16, 2019

On January 16, 2019, The City of Greenville held a public engagement meeting to address the following:

- > Status of FY2017 EPA Brownfields Assessment Grant Project
- > Intent to apply for FY2019 EPA Cleanup Grant Application for the former Elks Lodge Property
- > Intent to Apply for Y2019 EPA Assessment Grant Application which will focus on Downtown Greenville

The event was public noticed and well advertised. In all, there were 12+ who participated in the discussion. A copy of the PowerPoint Slides for the meeting is attached.

Those present agreed to complete site assessment nomination forms for properties in the city as appropriate.

In addition, those present agreed that the City's Brownfield Program funded by its FY2017 Assessment Grant is making progress and supported the FY2019 Cleanup and Assessment grant applications.

The one comment regarding the cleanup project came in a suggestion that the façade or arch/pillars associated with the former Elks Lodge building be preserved or duplicated and added as a feature for the park that is planned for the site. This suggestion will be considered once the grant is awarded and the park design is finalized.

Please contact Keith Ziobron, P.E. with any questions regarding this summary at 678-787-9576 or via email at Keith.Ziobron@Cardno.com.



Community Engagement Meeting
FY2017 EPA Brownfields Assessment Grant
FY2019 EPA Cleanup Grant Application
FY2019 EPA Assessment Grant Application
Greenville, Mississippi



January 16, 2019



I. Introductions & Meeting Summary

- I. Introductions & Meeting Summary
- II. EPA Brownfield Program
- III. Mississippi's Brownfield Program
- IV. Community Engagement/Input
- V. A Leveraged Vision for Greenville
- VI. Greenville's FY2017 Assessment Grant
- VII. Greenville's FY2019 Assessment Grant Application
- VIII. Greenville's FY2019 Cleanup Grant Application for Elks Lodge
- IX. Schedule

Thank You & Questions





II. EPA's Brownfield Program



A Brownfield site is defined as real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of hazardous substances, pollutants, contaminants, controlled substances, petroleum or petroleum products, or is mine-scarred land.





Objectives of Brownfields Redevelopment

- > Return Abandoned Underutilized Sites to Productive Reuse
- > Transformation
 - Generate Tax Revenues - Increase Property Values & TIF
 - Create Jobs
 - Combat Sprawl
 - Revitalize Blighted Areas
 - Address Environmental Justice Issues
- > Recycle Commercial and Industrial Properties
- > Ties into Sustainability
- > From Blight to Right
- > Support Redevelopment



 Cardno



Insights Into the Brownfields Process

- > Supports Economic Development
 - Promotes existing business expansion
 - New business creation
 - Job creation & growth
- > Often Real Estate Transactions With an Environmental Component
- > Banks and other lending institutions typically require some level of site assessment via due diligence process
- > Brownfields Focus can support Redevelopment Projects
 - Increases Project Profile
 - Economic Incentives (Local, State, and National)
- > Site Does Not Need to be Contaminated to be a Brownfield





Brownfields Include

*Solvent Contamination Sources –
Printers, Dry Cleaners and Auto Repair*



Junkyards



Brownfields Include

Hazardous Substances / Waste Sites



Former Industrial Properties





Brownfields Include

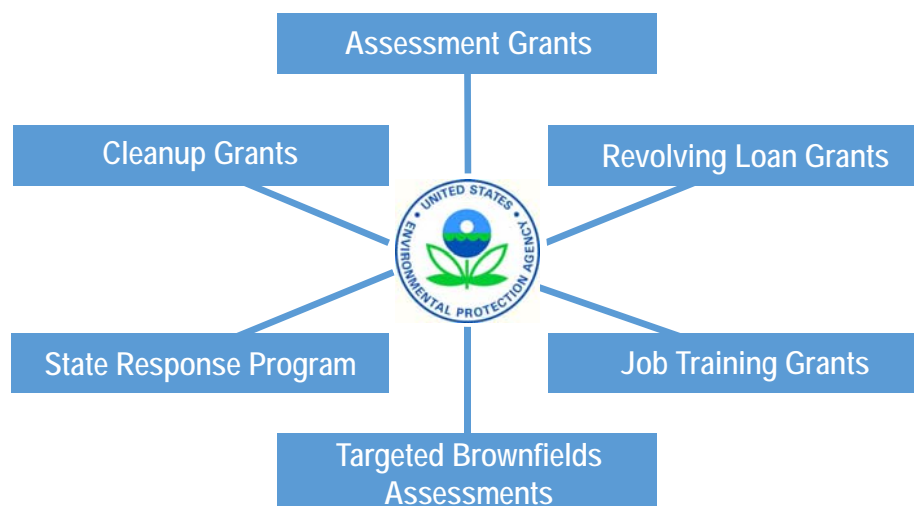
Former Landfills



Former Gas Stations / Auto Repair



Brownfields Assistance & Funding Opportunities





EPA Assessment Grants - CRA Advantages and Uses to Promote Redevelopment



\$300,000 EPA Brownfields Community Wide Assessment Grant

Or

\$600,000 EPA Brownfields Coalition Assessment Grant


Potential Activities Include :

- > Updated Brownfields Inventory – Identify Redevelopment Sites
- > Community Outreach and Engagement – Paramount to Brownfields Success
- > Phase I Environmental Assessments –
 - Petroleum Sites – Gas Stations & Tank Removals
 - Hazardous Substances – Solvents, Metals, Asbestos
 - Petroleum Sites/Hazardous Materials Sites
 - Remove and Quantity Environmental Stigma
- > Phase II Environmental Assessments
 - Presence or Absence of Contamination




DS2



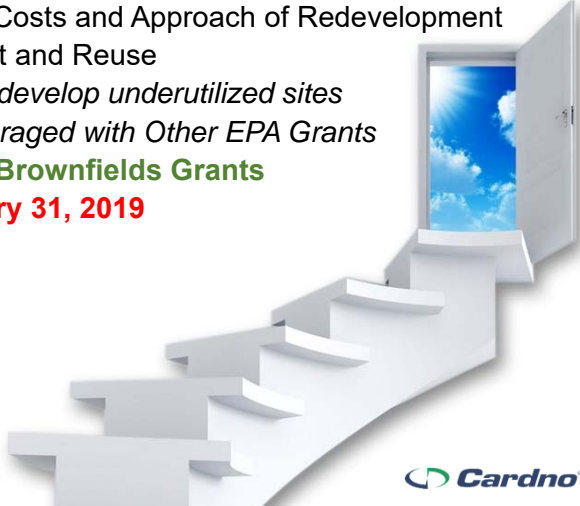



EPA Assessment Grant Advantages and Uses to Promote Redevelopment



EPA Brownfields Assessment Grant potential other Activities Include

- > Reuse Planning - Provides Community Visioning Tool
- > Remedial Planning – Helps to Quantify Costs and Approach of Redevelopment
- > Identification of Sites for Redevelopment and Reuse
- > *Education and Outreach – catalyst to redevelop underutilized sites*
- > *Assessment Grant Success can be leveraged with Other EPA Grants*
- > **Opportunity to Leverage Future EPA Brownfields Grants**
- > **Current Application Deadline: January 31, 2019**







Other EPA Grant Opportunities - Clean Up Grants



EPA Brownfields Clean-up Grant (Grantee may apply for 3 Cleanup Grants)

- > Up to \$1.5 million annually (\$500,000 per site)
- > Local governments or non-profits (20% match)
- > Non-profits Are Eligible

Brownfields Clean-up Revolving Loan Grants

- > Up to \$1 million annually for clean-up
- > 50% sub-grants for non-profits for *clean-up*
- > Low-to-no-interest loans for public and private sector



The US Conference of Mayors has identified lack of Clean-up Funding as the # 1 Impediment to Brownfields Redevelopment



III. Mississippi's Brownfield Program





Mississippi Brownfields Voluntary Cleanup and Redevelopment Act

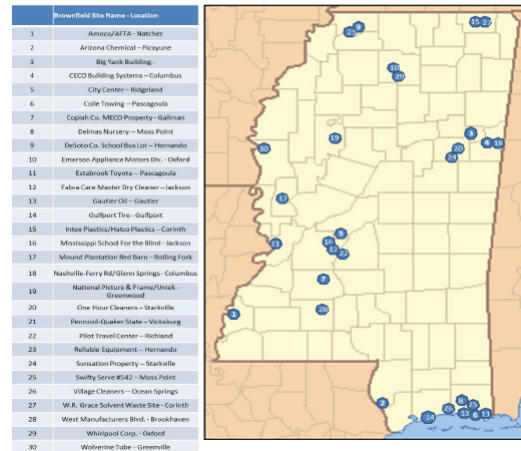
Mississippi Department of Environmental Quality (MDEQ) Brownfields Voluntary Cleanup and Redevelopment Act

- > Created in 1998
- > 440 acres back into productive use
- > Since FY 2017, 30 sites were included in the State's Program

Brownfields Incentives Act / Tax Credit

- > Cleanup costs for assessment, investigation, and remediation are eligible for a 25% tax credit
 - To be granted tax year which cost was incurred
 - Not to exceed \$40k
 - Unused portion of credit can be forwarded for succeeding tax years
 - Must be enrolled in and approved by MDEQ Brownfield Program

Mississippi Brownfields 2017



Mississippi Brownfields Voluntary Cleanup and Redevelopment Act



MDEQ is committed to working with EPA

- > Between FY 2009 and FY 2016, 82 communities applied for Assessment Grants, of which 24 were awarded
 - In FY 2014, City of Greenville was previously selected
 - Greenville's FY2017 Funds are more than 70% spent

MDEQ Contacts for this EPA Assessment

- > Thomas L. Wallace, P.E., Branch Chief
 - MDEQ | Groundwater Assessment Remediation Division
 - Phone: 601-961-5240
 - twallace@mdeq.ms.gov
- > Jay Liu
 - Brownfields Project Manager
 - Phone: 601.961.5318
 - Email: jliu@mdeq.ms.gov







IV. Community Input









Community Engagement/Input



The Brownfield Cycle

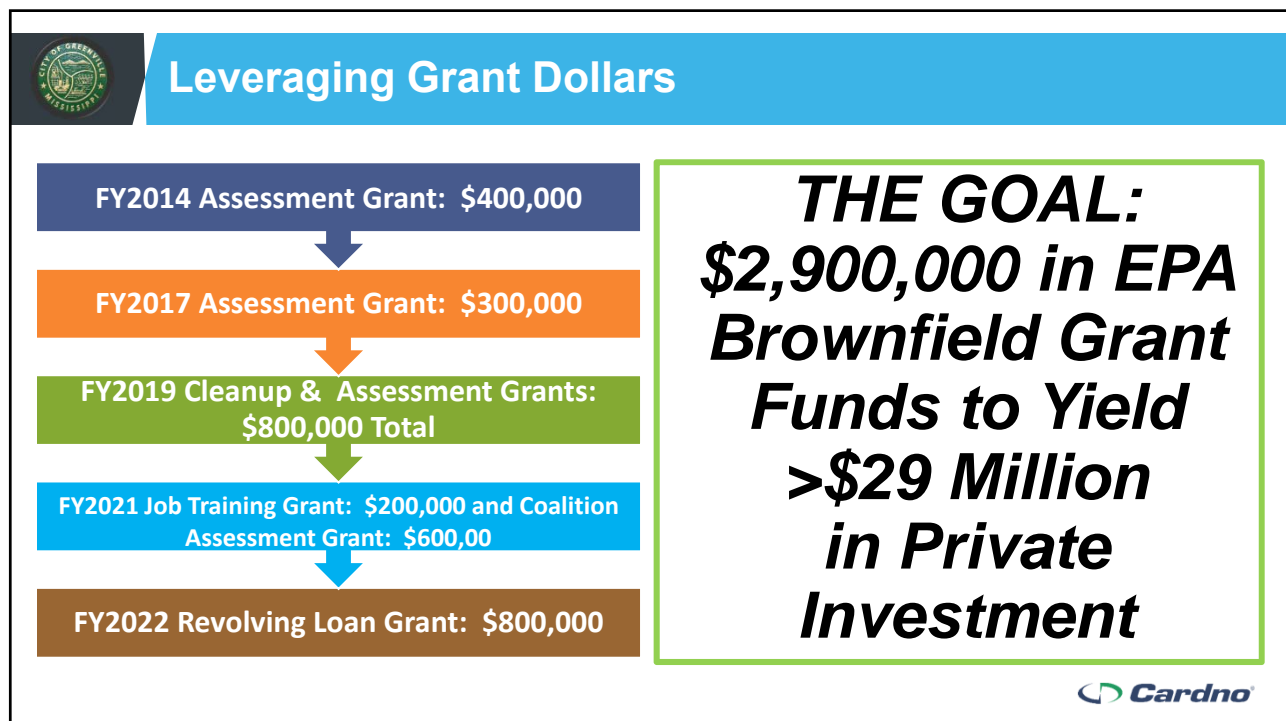
- Questions:**
We are here to listen!
- Community Involvement is Essential to any Brownfield Redevelopment Initiative**
- Are there areas that you would like to see assessed, cleaned up & redeveloped?**
- What are the development needs of the community?: Housing, clinics, Grocery stores, police substations, farmers markets, etc.?**
- How can we help?**
- What type of support do you feel that you or your organization can provide?**
- Site Nomination Forms Available**








V. A Leveraged Vision for Greenville




VI. Greenville's FY2017 Assessment Project



Overall Work Performed

Work Completed so Far:

- 1 Generic QAPP
- 9 Phase I ESAs
- 2 Asbestos and Lead-based Paint Surveys
- 1 Ecological and Wetland Assessment
- 4 SSQAPPs and Phase II ESAs
- 1 Analysis of Brownfield Cleanup Alternatives (ABCA) Report
- 2 Previous Community Engagement Meetings

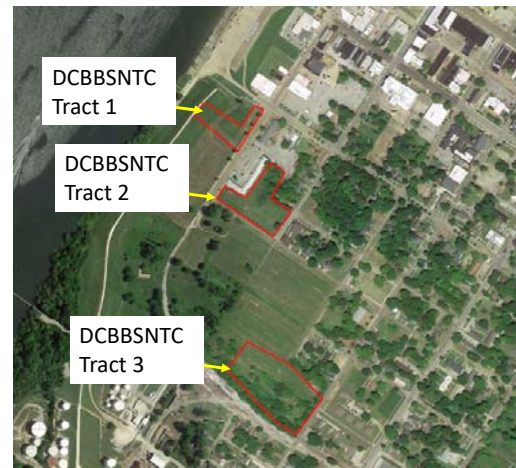




Key Projects - DCBBSNTC

Deer Creek & Black Bayou Steam Navigation & Trading Company (DCBBSNTC)

- Three separate vacant tracts
- Performed 3 separate Phase I ESAs
- Environmental concerns with historically lumber mill, adjacent railroad depot and gas plant
- Performed 1 Phase II ESA on all 3 tracts
- Identified minor metal contamination in GW; no major issues requiring cleanup
- Site currently being evaluated for redevelopment



Key Projects - Axminster

U.S. Axminster – former carpet manufacturer

- Performed a Phase I ESA
- Environmental concerns with historic manufacturing operations
- Performed an Ecological and Wetland Assessment
- Determined no active wetlands in former building footprint
- Performed a Phase II ESA
- Identified no contamination of concern
- Site currently being evaluated for redevelopment





Key Projects - Matcor

Matcor (formerly Cleaver Brooks)

- Performed a Phase I ESA
- Environmental concerns with historic boiler manufacturing
- Performed an asbestos inspection – none identified
- Performed a Phase II ESA – identified minor petroleum contamination on eastern corner
- Property has since been purchased and currently a \$20M project with 68 jobs to be created starting April 2019



Next Steps and Potential Targets

Budget Remaining to Complete the following:

- 2-3 Phase I ESAs
- 1-2 Phase II SSQAPPs and ESAs
- 1 ABCA

Potential Candidates include:

Name	Address
Friedman Iron and Metal	1100 Highway 82 West
Yazoo and MS Valley Farmers Depot	738 Washington Avenue
Former Cotton Seed Mill	Alexander and Edison
Walcotte Chemical Warehouse	North St and Alexander
200 Block of South Walnut Street	Multiple
200 Block of South Poplar Street	Multiple

Site Nomination Forms at Sign-in table





VII. Greenville's FY2019 Cleanup Application for the Elks Lodge



Cleanup Grant – Elks Lodge

Elks Lodge - Under current assessment

- Performed Phase I ESA
- Environmental concerns with adjacent properties, former gas stations, auto repair
- Performed asbestos and lead-paint survey – significant amount identified in all building materials
- Building Condition – determined to be structurally unsound
- Phase II ESA ongoing – identified lead contamination in shallow soil – approximately 55 cubic yards





Cleanup Grant – Elks Lodge

City Applying for 2019 EPA Cleanup Grant

- Demolition of building as asbestos debris under EPA approved wet methods
- Remove the lead contaminated soil, backfill with clean soil
- Request grant of \$350,000 to cover abatement, soil removal, and programmatic costs
- **Grant Application to be submitted January 31, 2019 (Draft Application and ABCA available today for Review)**
- If awarded, work would start Fall 2019



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VIII. Greenville's FY2019 Assessment Grant Application



 Cardno



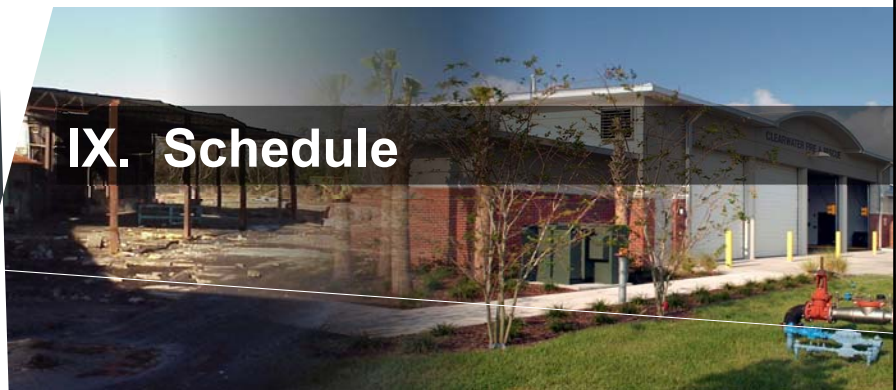
FY2019 Assessment Grant Application

City is Applying for a FY2019 Assessment Grant to continue assessment of key properties for redevelopment

- City has shown success with previous grants, creating redevelopment opportunities and paving the way for new development and jobs
- Still a significant need in the community for additional sites to be assessed – **Focus on Downtown Greenville**
- Grant due January 31, 2019
- If awarded, \$300,000 will be awarded and grant-specific work will start Fall 2019
- ***Draft application available for review***



IX. Schedule





Schedule

Task	Start Date	End Date
FY2017 Assessment Grant Started	October 2017	On-going
City of Greenville/EPA Kickoff Meeting	October 25, 2017	October 25, 2017
Public Participation Meeting 1	January 30, 2018	January 30, 2018
Site Selection Period	October 2017	October 2018
Access agreements obtained for Phase I & II ESAs	October 2017	May 2019
Phase I ESAs Completed	9 completed by December 2018	September 2019
Public Involvement Meeting 2	July 31, 2018	July 31, 2018
Phase II ESAs Completed (Including Site Specific QAPP development)	3 completed, one ongoing, January 2019	September 2019
Public Involvement Meeting 3	January 16, 2019	January 16, 2019
FY2019 Assessment Grant Application	December 2018	January 31, 2019
FY2019 Cleanup Grant Application	December 2018	January 31, 2019
FY2019 Grant Awards	May 2019	May 2019
Closeout Reporting for FY2017 Assessment grant	September 2019	October 2019
FY2019 Grant Kickoff Meetings	October 2019	October 2019
FY2019 Grant Public Engagement Meeting 1	November 2019	November 2019



QUESTIONS/THANK YOU

Keith J. Ziobron, P.E.

Senior Principal & Branch Manager

Cardno, Inc.

678.787.9576

keith.ziobron@cardno.com



**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Threshold Attachment

Public Meeting Sign-In Sheet



City of Greenville, Mississippi



Community Engagement Meeting

Sign-In Sheet

January 16, 2019

Print Name	Signature	Company/E-mail	Date
Will Coppage		WCEA WCOPPAGE@wceams.com	1/16
EVERETT Chinn		City of Greenville	1/16/19
Drew Newsom		Black Acve Group	1/16/19
Kristina Norman		DD-T	1/16/19
Lorann Thomas		city of Greenville	1/16/19
Carolyn Weather		City of Greenville	1/16/19
William Burle		W.C. Burle	1/16/19
Charles Lesure		Lesure's Demolition EMail lesuredemolition@aol.com	
Kenneth Aaron		Kenneth Excavation	1/16/2019
Amelia J Wicks		CDG	1/16/2019
Marianne GANNON		citizen / jackgannon@	1/16/19
JACK GANNON		bellsouth.net " / "	1/16/19

**Threshold Criteria-2019 EPA Cleanup Grant
Former Elks Lodge - 504 Washington Avenue
City of Greenville MS**

Threshold Attachment

Hardship Waiver Request

Hardship Waiver Request
FY 2019 EPA Brownfields Cleanup Grant
Applicant: City of Greenville, Mississippi
January 21, 2019

The City of Greenville, Washington County, Mississippi, **population 31,934¹**, sits on the east bank of Lake Ferguson, a tributary of the Mississippi River at the confluence of the two waterways in the heart of the Yazoo/Mississippi Delta. In May of 2011 a record flood shut down the port and river casinos, and residents between the levee and the river had to evacuate. The County was declared a federal disaster area (FEMA DR-1983). **The flood put 800 people out of work.** In the 5 years after the flood, the City saw the closing or the downsizing of many area employers: Delta Community Mental Health Center (232 jobs), Brintons US Axminster (150 jobs), Leading Edge Aviation Services (100 jobs), K-Mart (89 jobs), Wexford Health Services (81 jobs), Kroger (80 jobs), Jubilee Casino (77 jobs), and Loveland Products (24 jobs) all closed or downsized², and the jobs have not returned. This significant job loss forced some residents to move from the area. Compounding this distress, the City and County faced another major flooding disaster (FEMA 4268 DR) in March 2016.

Since 2000, our City population has decreased by 9,699 residents³ (2000 population = 41,633; 2017 population = 31,934). With loss of population and skilled workforce, the City has been hindered in attracting new business and expansion of existing enterprises. This negatively impacts support businesses such as health care, education, transportation, and housing creating a “domino effect.” Well-paying manufacturing jobs have been replaced by lower paying or part-time jobs.

The majority of Greenville’s residents classify as minority (81.8% minority, predominantly African-American). The Target Area which, includes the downtown and surrounding residences (Census Tract #6, Washington County), is almost exclusively minority (96.8%). Almost thirty-six percent (35.4%) of the City lives in poverty, while the Target Area exhibits a poverty rate of 66.4%! **The City’s median household income at \$28,204 is less than half that of the US** and the poverty rate is almost three times that of the US.⁴ **Washington County, MS is also classified as a persistent-poverty county by the USDA.**

Demographic Data⁵	Priority Site, located in Census Tract 6, Washington County, MS	Greenville, MS
Unemployment	43.9%	17.1%
Median Household Income	\$13,688	\$28,204
Per Capita Income	\$9,250	\$18,518
Poverty Rate	64.4%	35.4%

In 2016, the City of Greenville entered into a Consent Decree with the USEPA regarding violations of the Clean Water Act related to its wastewater treatment plant and sanitary sewer lines. No penalties were assessed, however the **estimated total cost to the City for the required**

¹ American Community Survey (ACS) 2017

² MS Department of Employment Security, Worker Adjustment and Retraining Notifications (WARN)

³ US Census 2000, FactFinder.com

⁴ ACS 2017

⁵ ACS 2017

wastewater system improvements is \$10,830,242 including annual debt service [Consent Decree Financial Capability Assessment]. The language in the Consent Decree itself indicates the City may have difficulty funding these improvements.⁶ Cost per household are estimated at \$1,565, or almost 6% of the 2017 median household income of \$28,204.

From 2016 to 2017 property tax revenues have decreased by 1.55%, and the City's overall net position decreased by \$1,111,822 in the same period; **overall, City revenues have decreased by more than \$2.9 million in the last 2 fiscal years** [City of Greenville Comprehensive Annual Report, year ended September 30, 2017-most recent completed]. While our resources are limited, we are working to improve our financial position. The City has decreased annual spending since 2015. We have invested leveraged resources in the area as described in the attached grant narrative. Further, the City will strive to secure additional grant dollars including the Community Foundation of Washington County (local) and Mississippi State Wildlife, Fisheries and Parks Outdoor Recreational Grants, such as Land Water Conservation Fund or Recreational Trails Program, to insure intended reuse for the target site (green space). Again, this waiver will allow the proposed cleanup activities to move forward; thus protecting our residents from the direct environmental and safety hazards associated with the building, and allowing for much need improvements to the community.

⁶ <https://cfpub.epa.gov/enforcement/case>

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

01/30/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Greenville

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

*** c. Organizational DUNS:**

0677234370000

d. Address:

*** Street1:**

340 Main Street

Street2:

*** City:**

Greenville

County/Parish:

*** State:**

MS: Mississippi

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

38701-4039

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Errick

Middle Name:

D.

*** Last Name:**

Simmons

Suffix:

Title:

Organizational Affiliation:

*** Telephone Number:**

662-378-1501

Fax Number:

*** Email:**

EDSimmons@greenvillems.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-07

* Title:

FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

FY2019 Greenville MS EPA BF Cleanup Former Elks Lodge Project

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="350,000.00"/>
* b. Applicant	<input type="text" value="70,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="420,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: